

INTRODUCTION

Welcome to the Tideway Scullers School's Privacy Statement.

Tideway Scullers School ("TSS", "we" or "us") respects your privacy and is committed to protecting your privacy. This Privacy Statement sets out the basis on which we will inform you as to how we look after any personal data we collect from you, or that you provide to us when you visit our website (regardless of where you visit it from), will be processed, and to tell you about your privacy rights and how the law protects you.

References to TSS's Rules and Constitution in this Privacy Statement mean the TSS's rules (last updated on 30 August 2017) and constitution (last updated on 3 September 2016), which are available on this website.

You can download a PDF version of this Privacy Statement here www.tidewayscullers.com/privacy. Please also use the Glossary at para 10 below to understand the meaning of some of the terms used in this Privacy Statement.

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1 **IMPORTANT INFORMATION AND WHO WE ARE**

1.1 **PURPOSE OF THIS PRIVACY STATEMENT**

This Privacy Statement aims to give you information on how TSS collects and processes your personal data through your use of this website, including any data you may provide through this website when you apply for membership, or take part in any courses, or become a member of TSS's 100 Club, or register or participate in any activity or event organised by or on behalf of TSS or apply for any positions with TSS.

It is important that you read this Privacy Statement together with any other Privacy Statement or fair processing notice we may provide on specific occasions when we are collecting or processing personal

data about you so that you are fully aware of how and why we are using your data. This Privacy Statement supplements the other notices and is not intended to override them.

1.2 CONTROLLER

TSS is the controller and responsible for your personal data.

We have appointed a data protection manager (DPM) who is responsible for overseeing questions in relation to this Privacy Statement. If you have any questions about this Privacy Statement, including any requests to exercise your legal rights please contact the DPM using the details set out below.

1.3 CONTACT DETAILS

Our full details are:

Full name of legal entity: Tideway Scullers School

Name or title of DPM: Rosemary Thom

Email address: dataprotectionmanager@tidewayscullers.com

Postal address: Tideway Scullers School, Dan Mason Drive, Chiswick, London W4 2SH

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.4 CHANGES TO THE PRIVACY STATEMENT AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 25 May 2018 and historic versions can be obtained by contacting the DPM.

You will be notified by email of any changes we make to our Privacy Statement.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2 THE DATA WE COLLECT ABOUT YOU

2.1 PERSONAL DATA

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped as follows:

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- Identity Data includes first name, last name, date of birth, gender, height and weight, and family member details.
- Contact Data includes postal address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, your vital interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, facilities, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Photographs and/or Audio or Visual Recording Data includes photographs and/or audio or visual recordings in which you appear to be used by TSS and the Internal Third Parties (see Glossary) as part of our marketing, publishing, communications and other related activities or programmes, in print, on websites and on social media.
- Special Category Data includes information about your health and medical conditions, genetic and biometric data, ethnicity, disabilities and any information about criminal convictions and offences.
- Recruitment Data includes the following:
 - Contact details (including names, postal addresses, email addresses and telephone numbers);
 - The information you have provided on our application form, including name, title, postal address, telephone number, personal email address, date of birth, gender, employment and rowing history, qualifications;
 - Special Category Data such as ethnicity, disability and any information about criminal convictions and offences;
 - Details of reference for employees or volunteers or prospective employees or volunteers.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine

or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Statement.

2.2 IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of your membership application form or TSS's Rules and Constitution or any contract we have with you and you fail to provide that data when requested, we may not be able to perform the obligations or provide the services we have or are trying to provide you with (for example, membership benefits, goods or services). In this case, we may have to cancel your membership, and accordingly the supply of products or services or any other membership benefits you have with us, but we will notify you if this is the case at the time.

3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for membership or our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy www.tidewayscullers.com/privacy for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - analytics providers such as Squarespace.com in the USA; and
 - email and search information providers such as Google based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU, to be advised.

- Identity and Contact Data from data brokers or aggregators based inside or outside the EU, to be advised.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4 **HOW WE USE YOUR PERSONAL DATA**

4.1 **USE OF PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data (including Special Category Data) in the following circumstances:

- When you have provided your explicit consent.
- Where we need to perform the membership contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting dataprotectionmanager@tidewayscullers.com.

Please bear in mind that where we are solely relying on your consent and if you withdraw your consent, we will stop processing your personal data, which will most likely mean that we can no longer provide you with membership benefits or products or services, and you may therefore not be able to continue as a member of TSS.

4.2 **PARENTAL CONSENT**

TSS has a strong Junior (aged 18 and under) section. Use of personal data of Juniors must be consented to in the following manner:

- For Juniors under the age of 13, by a Parent and/or Guardian
- For Juniors from the age of 13 to the age of 18, by the Junior and a Parent and/or Guardian

4.3 **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
(a) To assess your suitability as a member of TSS, for the different sections (ie squads) of TSS and safety issues (b) To register you as a new member/course participant	(a) Identity (b) Contact (c) Special Category	(a) Consent (b) Entering into a contract with you (c) Necessary for our, your and third party legitimate interests to protect you and others from harm and generally safety reasons.
(a) To provide services to you as a member (b) Manage membership payments, course fees and payments for race entries (c) Collect and recover money owed to us (d) Deal with Gift Aid and donations (e) To comply with legal and regulatory requirements, and ensure compliance with TSS's Rules and Constitution	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special Category	(a) Consent (b) Necessary for our legitimate interests (to recover debts due to us) (c) Performance of contract with you.
To manage our relationship with you which will include: (a) Notifying you about changes to TSS's Rules, Constitution, terms or privacy statements or notices (b) Asking you to leave a review or take or complete a survey (c) Obtaining information from you from surveys, feedback or questionnaires as to how TSS can seek your assistance and/or understand how to provide and/or improve membership services for you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members and other third parties use our products/services)

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<p>To administer and protect TSS's business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our club, provision of administration and IT services, network security, to prevent fraud and in the context of a governance reorganisation or restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content, newsletters and advertisements to you, whether as members, prospective members or alumni, and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) Photographs and/or Audio or Visual Recording</p>	<p>Necessary for our legitimate interests (to study how members and other third parties use our products/services, to develop them, to grow our club and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, members relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of members, alumni and third parties for our products and services, to keep our website updated and relevant, to develop our club and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about membership benefits or goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our club/products/services and grow the business of our club)</p>

To assess your ability to row, scull and use gym equipment, as well as ensuring due compliance with TSS's Rules and Constitution.	(a) Identity (b) Contact (c) Special Category	(a) Consent (b) Performance of a contract with you (c) Necessary for our, your and third party legitimate interests to protect you and others from harm and generally safety reasons.
To recruit potential candidates as employees, consultants or volunteers	Recruitment	Necessary for the purposes of entering into a contract with you and for our and third parties' legitimate interests to keep our employees, volunteers, members and those who use our services safe and for equal-opportunity monitoring

4.4 **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

4.5 **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you are a member, alumnus or have requested information from us or subscribed to or purchased any products or services from us or have registered for or participated in any of our events or activities and, in each case, you have not opted out of receiving that marketing.

4.6 **THIRD-PARTY MARKETING**

We will share your personal data with the Internal Third Parties. We will get your express opt-in consent before we share your personal data with any third party outside the Internal Third Parties or marketing purposes.

4.7 **OPTING OUT**

You (or in the case of Juniors, your Parents or Guardians) can ask us to stop sending you marketing messages at any time by contacting dataprotectionmanager@tidewayscullers.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

4.8 **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become

inaccessible or not function properly. For more information about the cookies we use, please see www.tidewayscullers.com/privacy.

4.9 **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 **DISCLOSURES OF YOUR PERSONAL DATA**

Other than as provided below, all the personal data that we hold about you will be processed by TSS's, TSS 100 Club's and Tideway Scullers Trading Limited's staff and volunteers in the United Kingdom and no third parties will have access to your personal data unless there is a legal obligation for us to provide it, or if we need to protect the rights, property or safety of TSS, our members, our alumni or others.

We may have to share your personal data with the parties set out below for the purposes set out in the table in para 4 above.

- Internal Third Parties as set out in the Glossary at para 10.
- External Third Parties as set out in the Glossary at para 10.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6 **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA), except incidentally by using our content manager, Squarespace.com, which is based in the USA.

7 **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees or volunteers who have a need to know for operational, marketing or fundraising purposes.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, which may include for the purposes of satisfying any legal, accounting, or reporting requirements.

We will also retain your personal data after you cease to be a member of TSS, though for such alumni we will only retain the name and email address.

Details of retention periods for different aspects of your Personal Data are available by contacting us using the details set out above

To determine the appropriate retention period for personal data, we take into account the expectations and requirements of members, sponsors and other stakeholders. We also consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, accounting, or reporting requirements.

When you consent to receive our marketing communications, any personal data we use for this purpose will be kept until you notify us that you no longer wish to receive this information, though it may be needed for other purposes as identified in para 4 above. In some circumstances you can ask us to delete your data: see Legal Rights para 9 below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

When we no longer need your personal data, we will securely delete or destroy it.

9 YOUR LEGAL RIGHTS

9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact dataprotectionmanager@tidewayscullers.com.

9.2 NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.3 WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.4 TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9.5 CONTACT

If you wish to exercise any of the rights set out above, please Contact us

10 GLOSSARY

“Legitimate Interest” means the interest of TSS in conducting and managing the club to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

“Performance of Contract” means processing your data where it is necessary for the performance of a contract (such as your membership application) to which you are a party or to take steps at your request before entering into such a contract.

“Comply with a legal or regulatory obligation” means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

“Internal Third Parties” means other TSS entities who are based in the United Kingdom, namely Tideway Scullers Trading Limited (who provide services relating to TSS to and for non-members) and TSS's 100 Club (which provides fundraising for TSS).

“External Third Parties” means

- Service providers acting as processors, content managers, email providers based in and outside the EU who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers and insurance brokers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, London Borough of Hounslow and Transport for London (TSS's landlords), TSS's regulators British Rowing and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Any other third parties, for example, easyfunding, Virgin Money Giving, Crewroom and Termxx, who may provide TSS with information.