



# AWCC DATA PRIVACY POLICY

## 1. About this Policy

- 1.1. This policy explains when and why we, the Association of the Waterways Cruising Clubs (AWCC), collects personal information about the members of our member clubs, how we use it and how we keep it secure and your rights in relation to it.
- 1.2. We may collect, use and store your personal data, as described in this Data Processing Policy and as described when we or your own club collect data from you.
- 1.3. We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website <http://awcc.org.uk/AWCCprivacy.pdf> regularly for any amendments (but amendments will not be made retrospectively).
- 1.4. We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you if you occupy one of our National or Regional Officer positions, but a “processor” of data provided by your own club if you do not occupy one of these positions.
- 1.5. In this policy, references to “Member” relate to a member of a club which is a member of the AWCC. Membership of the AWCC is not open to individuals, only to clubs to which those individuals may belong.
- 1.6. This policy is effective from 25<sup>th</sup> May, 2018.

## 2. Who are we?

- 2.1. We are the Association of Waterways Cruising Clubs (AWCC). We can be contacted by e-mail at [webmaster@awcc.org.uk](mailto:webmaster@awcc.org.uk), or by using any of the other details listed on the Contacts page of our website, <http://awcc.org.uk/wp/contact-us/>.

## 3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Member's name, private e-mail address and club membership	Managing the Member's login credentials for the AWCC website.	Performing the AWCC's contract with the Club, to provide access to the website for the Club Member as a result of a request or data entry by the club for a login to be provided. The Club is responsible for establishing the legal basis for providing this information. A Member may at any time request termination of their access to the Members Area of the AWCC website by contacting us by email or letter, upon which this data and the login ID will be deleted.

Type of information	Purposes	Legal basis of processing
The name, title, email address(es), telephone number(s) of Club Officers.	<p>Maintaining contact details between Club Officers and AWCC National &amp; Regional Officers</p> <p>Inclusion in the AWCC handbook and in the members area of the AWCC website for Club Officers. Name and public e-mail address for Club Membership Secretary may optionally be displayed in the public area of the AWCC website.</p>	<p>Performing the AWCC's contract with the Club to record details of their Club Officers. The Club is responsible for establishing the legal basis for providing this information, but this would normally be for the purposes of the Club's Legitimate Interests in maintaining a working relationship between the Club and the AWCC.</p> <p>Performing the AWCC's contract with the Club to record details of their Club Officers. The Club is responsible for establishing the legal basis for providing this information, but this would normally be by Consent, managed by the Member's own Club. A Member may update their own details and the visibility of them via the AWCC website. Any update to a Member's record is stamped with the date and time of update and the login ID used. Alternatively, the Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Handbook or on the website.</p>
The name and title of AWCC National and Regional Officers.	Inclusion in the AWCC Handbook and in the Officers list on the website	For the purposes of the AWCC's Legitimate Interests in publishing a list of its Officers.
The email address(es) and telephone number(s) of AWCC National and Regional Officers.	<p>Access to the data restricted to other AWCC Officers.</p> <p>Inclusion some or all of the contact details in the AWCC handbook and in the members area of the AWCC website. Details for some AWCC Officers is available on the public areas of the website</p>	<p>For the purposes of the AWCC's Legitimate Interests in maintaining communication between itself and its officers.</p> <p>Publishing of this data will be on a Consent Basis, managed by the AWCC. An AWCC Officer may update their own details and the visibility of them via the AWCC website. Alternatively, the Officer may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Handbook or on the website.</p>

Type of information	Purposes	Legal basis of processing
Photos and videos of members, including associated captions and event/news reports	Putting on the AWCC's website and using in press releases.	Performing the AWCC's contract with the Club to publish Club news and event reports. The Club is responsible for establishing the legal basis for providing this information, but this would normally be by Consent, managed by the Member's own Club.
Web server log entries, which may contain information relating to login ID, internet protocol (IP) addresses, browser type, internet service provider (ISP), visited/referring/exit pages, platform type and date/time stamp.	Administration of the website.	For the purposes of the AWCC's legitimate interests in providing the website services.

#### 4. How we protect your personal data

- 4.1. We will not transfer your personal data outside the EEA without your consent.
- 4.2. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.3. Please note however that where you or your Club are transmitting information to us over the internet this can never be guaranteed to be 100% secure. When entering data directly to our website, this is encrypted using an SSL certificate.
- 4.4. We will notify you promptly as soon as we become aware of any breach of your personal data which might expose you to serious risk.

#### 5. Who else has access to the information you provide us?

- 5.1. We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.
- 5.2. We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print our Handbook or to host our website). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

#### 6. How long do we keep your information?

- 6.1. We will hold your personal data on our systems for as long as you are a member of your Club. We determine your continued membership of your Club by the following means:-
  - 6.1.1. You continue to be listed as an Officer of your Club or as an AWCC National or Regional Officer.

- 6.1.2. If you are not recorded as an Officer as in the previous paragraph, your login is revalidated at the start of each year. If such revalidation has not taken place by the end of that year, you will be deemed to have left your Club, and your data will be deleted. If your login ID has not been revalidated and you attempt to use the members area of the website after the end of February of that year, you will be prevented from accessing any content till revalidation has taken place.
- 6.2. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.
- 6.3. If circumstances require it, we will delete your data at the request of yourself or your Club.
- 6.4. Any photographs directly linked to your identity will be deleted, but general photographs taken at Club or AWCC events on which you may appear will not generally be removed.
- 6.5. Web server log files are deleted in accordance with the retention and deletion policies of our hosting supplier.

## 7. Your rights

### 7.1. You have rights under the GDPR:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances.

### 7.2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

Telephone 0303 123 1113.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Webmaster at [webmaster@awcc.org.uk](mailto:webmaster@awcc.org.uk).