

PADDLE UK PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your time as a member of Paddle UK¹. This notice explains how we comply with the law on data protection and what your rights are in relation to your personal data. For the purposes of the data protection law, we will be the “controller” of your personal information in relation to your membership of Paddle UK.

This notice applies to you whatever category of membership you have with Paddle UK either:

1. A Digital member;
2. A Club Associate member;
3. An On The Bank member; or
4. An On The Water member.

References to **we**, **our** or **us** in this privacy notice are to Paddle UK. Paddle UK is a trading name of British Canoeing, whose registered office is at National Water Sports Centre, Holme Pierrepont, Nottingham NG12 2LU, with the company registration number 1525484.

We are registered with the Information Commissioner's Office (with the registration number [Z9466524](#)) and have appointed a Data Protection Officer to oversee our compliance with data protection laws in our organisation. Contact details of the Data Protection Officer are set out in the "**Contacting us**" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as:

- your personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- your date of birth;
- your gender;
- your membership details including start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- your use of and movements through our online portal, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information;
- any disciplinary and grievance information;
- details of your next of kin, family members, and emergency contacts;

¹ Paddle UK is a trading name of British Canoeing which is a Company registered at Companies House with the registered number 01525484.

- records of your attendance at any events, courses and/or competitions hosted by us;
- details pertaining to the application, prevention, detection, compliance with, investigation, or enforcement of regulations and governance, including any breaches of any applicable Regulations or Codes of Conduct;
- images of you at events (e.g. Club Conference, AGM) and/or competitions in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation; and
- information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- information about criminal convictions and offences, including information that may be disclosed by the disclosure and barring service.

We may not collect all of the above types of special category personal information about you but in relation to the special category personal data that we do process, we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis as set out in Schedule 1, Part 2 of the Data Protection Act 2018 which includes where processing is necessary for:
 - i** the safeguarding of children and individuals at risk;
 - ii** protecting the public;
 - iii** anti-doping in sport; or
 - iv** maintaining standards of behaviour in sport.
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law;
- or based on your explicit consent.

Where you have given us consent, we may also collect and process collect personal data relating to diversity, inclusion and disability for monitoring purposes and to allow us to better identify and improve engagement with minority groups that are underrepresented in paddling, identify the reduction in engagement in certain groups as they grow older and to provide associated reports to Sport England, UK Sport and key selected partners.

In the table in section 4, we refer to the reasons detailed above as the “special category reasons for processing of your personal data”.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you become a member of Paddle UK; when you purchase any services or products we offer online,

when you make a query and/or complaint or when you correspond with us by short message service (SMS), multimedia messaging service (MMS), rich communication services (RCS), phone, e-mail, live chat or in some other way.

In some circumstances we process personal information provided to us by a third party. Where you are registered through an affiliated club, they may collect your details and pass them to us. You may also choose to provide us with other information on your online membership profile.

Monitoring and / or recording telephone calls and video teleconferences:

Please note that we may record and monitor incoming and outgoing telephone calls and video teleconferences.

When we record telephone calls and / or any video teleconference, we do so to protect the interests of those participating in the call, to accurately address queries, resolve disputes and to provide evidence in case of any misunderstandings. We may also use the recordings to ensure the quality of our customer service and for staff training exercises to improve the quality of our services. The telephone calls that we record will be kept secure and subsequently deleted in a structured and organised manner.

Information relating to third parties:

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of whom you deem it appropriate. They also have the same rights as you do and as are set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved, and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
<u>All Members</u>		

<p>To administer any membership account(s) you have with us and managing our relationship with you, including arranging for any insurance and licences and dealing with payments and any support, service or product enquiries made by you</p>	<p>All contact and membership details, transaction and payment information, records of your interactions with us.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p>To arrange and manage any contracts for the provision of any merchandise, products and/or services.</p>	<p>All contact and membership details. Transaction and payment information.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.</p>
<p>To send you information which is included within your membership benefits package, including details about magazines, our newsletters, advanced ticket information for competitions, your insurance, competition entries and events, meetings and training opportunities, partner offers and discounts and any updates on paddle sport.</p>	<p>All contact and membership details, including where applicable your paddling preferences.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p>To send you other marketing information we think you might find useful or which you have requested from us, including information about 3rd party events, participation products and information about our commercial partners.</p>	<p>All contact and membership details and marketing preferences</p>	<p>Where you have given us your explicit consent to do so.</p>
<p>To answer your queries or complaints</p>	<p>Contact details and records of your interactions with us.</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.</p>
<p>Retention of records</p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints, disciplinary and safeguarding matters or legal claims. We need to retain records in order to properly administer</p>

		<p>and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies, membership surveys, and insight projects to better understand your participation preferences, event attendance and trends within the sport	All contact and membership details, your responses to surveys and insight projects. Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.

For some of your personal information there will be a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and as such we may have to terminate your position as a member. For other personal information you may not be under an obligation to

provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. MEMBERSHIP COMMUNICATIONS & DIRECT MARKETING

As part of your Membership, we may contact you by email, post or SMS with important service or administrative messages which are necessary for the fulfilment of our contract with you. Where this information is necessary for the fulfilment of our contract with you, it will not be possible to opt out of these service or administrative messages whilst remaining a member.

From time to time, we may also contact you by email, post or SMS with information about paddlesports products and services we believe you may be interested in ("marketing messages") These marketing messages will only be sent to you in accordance with the marketing preferences you set. You can also let us know at any time that you do not wish to receive marketing messages by clicking on the unsubscribe link in the marketing emails we send to you or emailing the membership department at hello@paddleuk.org.uk to update your preferences in this regard.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may share personal information with the following parties:

- **Any party approved by you.**
- **To any Discipline Committees, Regional bodies, or International bodies for the activities covered by Paddle UK:** to allow them to properly administer the sports on a local, regional, national and International level.
- **To Paddle UK affiliated Clubs:** either where you are a member of the Club and have consented to the data being shared with them or where it is necessary to share information about your conduct, membership status, or the outcome of any disciplinary/safeguarding matter.
- **The National Associations (Paddle Scotland, Canoe Wales, and Paddle Northern Ireland):** where this is necessary for the administration of the sport across the United Kingdom or where it is necessary to ensure a coordinated approach to safeguarding and/or disciplinary matters;
- **To Paddle UK Disciplinary and Appeal Panel & Case Management Group members:** as is necessary for the purposes of disciplinary, safeguarding, and appeal matters as well as investigating alleged wrongdoing.
- **Other service providers:** for example, email marketing specialists, ticketing operators, payment processors, data analysis, legal advisors, anti-doping testing providers, medical providers, investigatory service providers, CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);

- Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers,
- **Our Commercial Partners:** for the purposes of providing you with insurance, information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership package where you have given your express consent for us to do so
- **The Sports Councils (such as UK Sport and Sport England):** where this is necessary for the administration of the sport, where your personal data is included in any images or videos taken by us at our competitions and events for promotional and journalistic purposes, or where we are required to report equality, diversity and inclusion data to them.
- **The Government, statutory agencies, or regulatory bodies (such as UK Anti-Doping, ICO, Public Health England):** where we are required to do so by law, for reasons of public health or safety, or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

Where we do share personal information with any of the third parties detailed above, we will only share such personal information as is necessary and proportionate to the specific purposes and will take appropriate steps to ensure the data is processed and shared securely with appropriate organisational and technical measures in place. We do not disclose personal information to anyone else except as set out above or in any of our other Privacy Notices that apply to you.

7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. Full details of how long we retain different categories of data can be found in our Data Retention Policy.

In some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic membership records for a period of 10 years after your last contact with us.

Exceptions to this rule are:

- Information that may be relevant to personal injury claims, insurance matters or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have been involved for us.
- Information gathered during the course of a Safeguarding investigation will be retained by Paddle UK as part of its duty to protect children and will be kept for at least 25 years. Where the concern relates to an adult's behaviour around children, the file will be kept securely until the adult reaches 65 or for 10 years whichever is longer in accordance with NSPCC guidelines on records retention and storage.
- Information relating to qualifications which may be retained for a longer period where it is necessary to support Complaints, Appeals, or to comply with other legal or regulatory obligations.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You may be able to update some of the personal information we hold about you through this form or by emailing us at hello@paddleuk.org.uk alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

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

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making are not absolute and may not apply as there are specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information, we are here to help and encourage you to contact us to resolve your complaint first. However you can also complain to the UK Information Commissioner's Office, the data protection regulator in the United Kingdom.

9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented

from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. **CONTACTING US**

Joy Johnston, Head of Governance is the Data Protection Officer. In the event of any query or complaint in connection with the information we hold about you, please email her at GDPR@paddleuk.org.uk or write to her at Paddle UK, National Water Sports Centre, Adbolton Lane, Holme Pierrepont, Nottingham, NG12 2LU.