

Paddle UK Data Protection Policy

1. POLICY STATEMENT

- 1.1. Everyone has rights with regard to the way in which their personal data is handled. Personal Data is any information identifying an individual or information relating to a living, identified or identifiable individual (Data Subject) that we can identify - directly or indirectly - from that data alone or in combination with other identifiers we possess or can reasonably access. During the course of our activities we will collect, store and process Personal Data about our customers, members, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.
- 1.2. Paddle UK¹ is committed to a policy of protecting the rights and privacy of individuals in accordance with the Data Protection Laws. The retained EU law version of the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 demand higher transparency and accountability in how we manage and use Personal Data. It also accords new and stronger rights for individuals to understand and control that use than under previous Data Protection laws.
- 1.3. This Data Protection Policy applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, members or supplier contacts, shareholders, website users, or any other Data Subject. Data Users are obliged to comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary action.

2. ABOUT THIS POLICY

- 2.1. This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.
- 2.2. This policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.3. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data. This policy should be read in conjunction with the Paddle UK Data Breach Policy, the Paddle UK Data Retention Policy, the Paddle UK Employee and Key Volunteer Data Processing Policy, as well as the applicable Paddle UK Privacy Notices.
- 2.4. We have appointed a Data Protection Officer to oversee our compliance with data protection laws. If you have any questions about this Policy or what we do with your personal information, their contact details are set out in the "Contact Us" section below.

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

3. ABOUT THE DATA PROTECTION LAWS

- 3.1. The Data Protection Act 2018 (“DPA 2018”) and the UK GDPR (together “Data Protection Laws”) apply to any personal data that we process. These Data Protection Laws strengthened and extended the provisions of the Data Protection Act 1998.
- 3.2. The Data Protection Laws require that the personal data is processed in accordance with the Data Protection Principles (see Section 5 below) and gives individuals rights to access, correct and control how we use their personal data. Full information regarding these rights is provided in the Privacy Notices.

4. COMPLIANCE

- 4.1. Paddle UK is a trading name of British Canoeing which is registered as a data controller with the Information Commissioner's Office (ICO) with the registered number Z9466524. We have a long-standing commitment to compliance with the applicable Data Protection Laws. This commitment has included taking a proactive approach to ensuring compliance with the UK GDPR. Paddle UK will comply with its obligations under the UK GDPR by following the Data Protection Principles below.

5. DATA PROTECTION PRINCIPLES

- 5.1. The Data Protection Laws place a responsibility on every data controller to process any Personal Data in accordance with a number of principles relating to the processing of Personal Data. Paddle UK adheres to these principles which require personal data to be:
 - 5.1.1. processed lawfully, fairly and in a transparent manner in relation to individuals;
 - 5.1.2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - 5.1.3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - 5.1.4. accurate and, where necessary, kept up to date; taking every reasonable step to ensure that inaccurate personal data – having regard to the purposes for which it is processed – is erased or rectified without delay;
 - 5.1.5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
 - 5.1.6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage;

5.1.7. made available to Data Subjects and allow Data Subjects to exercise certain rights in relation to their Personal Data (see Data Protection Rights below).

5.2. The Data Protection Laws also state that data controllers must ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

6. LAWFULNESS, FAIRNESS AND TRANSPARENCY

6.1. Personal data must be Processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

6.2. The Data Protection Laws specify that data controllers may only collect, process and share Personal Data fairly and lawfully and for specified purposes. The UK GDPR restricts our actions regarding Personal Data to specified lawful purposes.

6.3. The UK GDPR allows Processing for specific purposes, some of which are set out below:

6.3.1. the Data Subject has given their Consent;

6.3.2. the Processing is necessary for the performance of a contract with the Data Subject;

6.3.3. to meet our legal compliance obligations;

6.3.4. to protect the Data Subject's vital interests;

6.3.5. to pursue our legitimate interests (or those of a third party) for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects.

6.4. Further information on the purposes for which we process different categories of Personal Data are set out in our Privacy Notices.

7. DATA PROTECTION RIGHTS

7.1. Under data protection laws individuals have certain rights in relation to their own personal data. In summary these are:

7.1.1. The rights to access their personal data, usually referred to as a subject access request;

7.1.2. The right to have their personal data rectified;

7.1.3. The right to have their personal data erased, usually referred to as the right to be forgotten;

7.1.4. The right to restrict processing of their personal data;

- 7.1.5. The right to object to receiving direct marketing materials;
 - 7.1.6. The right to portability of their personal data;
 - 7.1.7. The right to object to processing of their personal data; and
 - 7.1.8. The right to not be subject to a decision made solely by automated data processing.
- 7.2. Not all of these rights are absolute rights, some are qualified and some only apply in specific circumstances.
- 7.3. Anyone wishing to exercise any of these rights should apply in writing to the DPO. Any member of Paddle UK staff receiving any such request shall forward it to the DPO.
- 7.4. When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:
- 7.4.1. We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
 - 7.4.2. We will suggest that the caller put their request in writing if we are not sure about the caller's identity and/or where their identity cannot be checked.
- 7.5. Our employees will refer a request to their Line Manager or the DPO for assistance in difficult situations. Paddle UK will not tolerate any harassment or intimidation of its employees who are carrying out their duties in accordance with this policy.

8. SECURITY

- 8.1. Paddle UK has an obligation to put in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.
- 8.2. Paddle UK has a separate Employee Data Protection Policy which sets out the obligations on members of staff who are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties. We will ensure that all personal data is accessible only to those who have a valid reason for using it. We will have in place appropriate security measures such as password protecting personal data held electronically and ensuring personal data is accessible only to those who have a valid reason for using it.
- 8.3. The organisation backs up data every day and has multiple copies (at least one set for each day of the week and additional weekly ones in order to have at least 3 months' worth of data at any one time). Records of these are kept. Backups are kept off site on the cloud. Backups are verified regularly by the software and system supplier.

- 8.4. Master copies of software are stored in cloud storage that is backed up to another cloud storage.
- 8.5. All end user devices, servers and network equipment are configured to install security patches and firmware updates within 14 days of them being released by the vendor.
- 8.6. Firewall and Malware protection are automatically updated with high priority updates and Staff are given annual security awareness training to ensure they are equipped to respond to the latest security threats.
- 8.7. Computers are protected from physical harm, theft or damage, and from electrical surges using protective plugs. The organisation plans for how to deal with loss of electricity, external data links, Server failure and network problems.

9. CONTACT US

- 9.1. The Data Protection Officer (DPO) is responsible for ensuring compliance with the Data Protection Laws and with this policy. This post is held by Joy Johnston, Head of Governance (joy.johnston@paddleuk.org.uk) any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the DPO or to GDPR@paddleuk.org.uk.

10. REVIEW

- 10.1. We reserve the right to change this policy at any time. Where it is appropriate and changes are substantive, we will notify data subjects of those changes by mail or email.
- 10.2. The Policy will be reviewed every three years.