



Talkin Tarn Amateur Rowing Club

Data Protection Manual

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Scope

This document applies to all personal data processed by TTARC, including data on members (live, historic or prospective) and visitors. It covers data collected, stored, accessed, processed, and shared within the club's activities.

Definitions

<i>Data</i>	Information about an individual recorded on paper that is intended to go on a computer and electronic records stored on a computer.
<i>Personal Data</i>	Data from which a living individual can be identified, e.g. name, address, driving licence number, date of birth, NI number or passport number
Confidential Data	Data given in confidence and not in the public domain, to be maintained within an agreed timescale, e.g. medical or financial information.
Sensitive Personal Data	Data relating to a person's opinions, e.g. political or religious beliefs and sexual preferences, or medical information. In order to process sensitive data, the Data Controller must have the consent of the Data Subject.
Data Controller	The Club Committee who determine the purpose, use and processing procedure of the data.
Data Subject	The individual who is the subject of the data.
Data Subject Rights	The access rights of an individual to data held about them.
Data Processing	A term used to describe the broad task of data handling, including organisation, adaptation or alteration of the information or data; retrieval, consultation or use of the information or data; disclosure of the information or data by transmission, dissemination or otherwise making available; or alignment, combination, blocking, erasure or destruction of the information or data.



Roles and Responsibilities

All Members:

- Will take responsibility for providing their own accurate data and keeping this up to date.
- Will make themselves familiar with and follow this Data Protection Manual.

The Committee:

- Will ensure the role of Membership Secretary is fulfilled by either a dedicated person or, by default, the Committee.
- Will support and endorse British Rowing and legal advice to the best of their knowledge and ability.
- Will arrange for action to be taken against any member(s) who do not fulfil their roles and responsibilities as listed.

The Membership Secretary:

- Will conduct the tasks required of them as listed in the official Officer Roles and Responsibilities document.

The Treasurer:

- Will conduct the tasks required of them as listed in the official Officer Roles and Responsibilities document.



Data Protection Policy Statement

Talkin Tarn Amateur Rowing Club (TTARC) is aware of its responsibilities to comply with the Data Protection Act (DPA) 1998 (and subsequent amendment of 2003) with regards to collecting, handling and processing personal data about its members. The Club is committed to respecting member privacy.

This policy defines data in accordance with the DPA and outlines the data protection principles and roles of members within the club who handle data and must adhere to those principles.

Our Commitment includes:

- *Lawfulness, Fairness, and Transparency*
Data will be processed legally, fairly, and in a transparent manner.
- *Purpose Limitation*
Data will be collected for specified, legitimate purposes and not processed beyond these purposes. If personal data is to be published online, then the Data Subject's consent will be sought. Details shall not be given to anyone from outside of TTARC or for non-club related purposes, without the individual's or parent/carer's consent.
- *Data Minimisation*
Only the necessary amount of data will be collected for the stated purposes. Th
- *Accuracy*
Personal data will be accurate and kept up to date where necessary.
- *Storage Limitation*
Personal data will be retained only as long as necessary for the purposes for which it is processed.
- *Integrity and Confidentiality*
Data will be processed in a manner that ensures appropriate security and protection.

In accordance with the DPA, the Club is satisfied that it qualifies as a not-for-profit organisation and is therefore exempt from registering with the Information Commissioner's Office (ICO) to process data, but acknowledges that it still has a responsibility to comply with the eight Data Protection Principles set out in the DPA. The club's duties under the DPA apply from the moment a member's data is obtained until such data has been returned, securely deleted or destroyed.

The club shall ensure that standard forms shall be used to collect data and they shall make the purpose for collection clear, set out what will happen to that data and how long it shall be kept. Forms shall also indicate where consent is required, and in the case of children below the age of 18, parent/carer consent shall be obtained as good practice and as a precautionary measure (not strictly required for children over the age of 12 years).

It is recognised that no written rules or plans can cover all situations and all members will be encouraged to continually assess their data accuracy and cooperate with the Club to meet the above principles.

By adhering to these principles, TTARC aims to manage a responsible and compliant system for all members and visitors, allowing everyone to focus on the joy of rowing and community involvement.

Approved by: TTARC Committee
Date: February 2025



Data Privacy Notice

This notice is to explain how TTARC may use personal information we collect before, during and after a person's membership. This notice applies to any person who has registered to become or is a member of the club. This notice explains how TTARC comply with the law on data protection, what individuals' rights are and that for the purposes of data protection TTARC will be the controller of any personal information.

References to we, our or us in this privacy notice are to Talkin Tarn Amateur Rowing Club Limited (Company Number: 09859297). We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Committee has overall responsibility for data protection compliance in our organisation.

Personal information we may collect from you

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain personal information about you, such as information regarding your personal contact details that allows us to contact you directly such as:

- Name, title, email addresses and telephone numbers
- Date of birth
- Membership 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 make payments to you and details of the financial transactions with you
- Records of your attendance at any events hosted by us
- Images in video and/or photographic form and voice recordings unless permission has otherwise been withdrawn
- Details of emergency contacts which may be shared with other members for ease of access in case of an emergency
- Records and assessment of performance including on-land and on-water times and performance, competition results, details regarding events attended and performance
- Any disciplinary and grievance information

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

- information about your health, including any medical condition.

We may not collect all of the above types of personal information about you. 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
- 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.

In the table below' we refer to these as the "special category reasons for processing of your personal data". We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.



Where we collect your information

We typically collect personal information about our members when you apply to become a member of the club, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

You are providing us with details of emergency contacts and they have a right to know and to be aware of how 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 them. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

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
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
To send you information which is included within your membership, including details about training, competitions and events, partner offers and discounts and any updates on rowing	Contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about our commercial partners	Contact details and marketing preferences	Where you have given us your explicit consent to do so
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they



		may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records. 3 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
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 to better understand event attendance and trends within the sport	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 club, 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 tax requirements	Records of attendance	We have a legal obligation to provide information on attendance and participation in sport.
To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction and payment data	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.
To arrange for any trip or transportation to and from an event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. 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.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate	Health and medical information	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.



adjustments to our sports facilities		
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for 4 processing of your personal data” referred to in section 2 above
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent

For some of your personal information you will have 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 we may have to terminate your membership. 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.

Direct marketing

From time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by mailing us at talkintarnarc@gmail.com. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.



Disclosure of your personal information

We share personal information with the following parties:

- To our governing bodies (British Rowing) or regional bodies (Northern Rowing Council) for the sports covered by our club to allow them to properly administer the sports on a local, regional and national level
- The Government or our regulators: where we are required to do so by law 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.

Transferring your personal information internationally

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union unless for competition purposes which you have confirmed.

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. However, 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 records for a period of 6 months after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 6 months
- Details regarding prospective membership applicants where intake has not yet been undertaken.
- Information that may be relevant to personal injury 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 the event.

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. Alternatively, you can contact us by using the details set out in the "Contacting us" section below.

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, may not apply as they have 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 you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

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.

Contacting us

In the event of any query or complaint in connection with the information we hold about you, please email talkintarnarc@gmail.com or write to us at Talkin Tarn Country Park, Brampton. CA8 1HN.



Data Protection Breach Procedure

Principle Seven of the Data Protection Act states that; ‘appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.’

If a breach occurs we would take the following steps:

1. *Containment and recovery*

As soon as a breach of confidentiality is discovered we would assign a person to be responsible for ensuring that the breach is contained. We would establish who needs to be aware of the breach and how they can help in containing it. We would act to recover the data as soon as possible .If we felt it was appropriate we would inform the police.

2. *Assessment of ongoing risk*

We would access the type of data involved and it’s level of sensitivity. We would also assess how much data was involved and the number of people affected. We would endeavour to find out what has happened to the data and if stolen, whether it could be used harmfully. We would assess whether the data could lead to physical risk or damage of reputation for the people involved. We would also assess whether the information could lead to identity fraud or financial loss. Dependent on the type of data we would also assess the damage to the reputation of the club.

3. *Notification of breach*

We would decide who needed to be informed of the breach. This would be based on who was involved and the type of information. We would make sure that we were meeting our security obligations with regard to the seventh data protection principal. We would also make sure we have a clear purpose as to our reasons for notifying individuals. If it was felt necessary we would inform the ICO. For guidance on whether to inform them we would go to www.ico.gov.uk.

4. *Evaluation and response*

We would investigate the cause of the breach and how we responded to it. We would review all aspects and update our policies and procedures in light of what we found. We would look for any weak points in our system and work to improve them.

Document Control

Document Control		
Date	Description	By Who
15/02/2025	Updated to merge numerous existing data protection documents into one; reviewed by JL	JL