

1. POLICY STATEMENT

- 1.1. Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities we will collect, store and process personal data about our customers, 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. British Canoeing is committed to a policy of protecting the rights and privacy of individuals in accordance with the Data Protection Laws. The new General Data Protection Regulation (GDPR) regulatory environment demands higher transparency and accountability in how British Canoeing manages and uses personal data. It also accords new and stronger rights for individuals to understand and control that use.
- 1.3. 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.
- 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.

3. ABOUT THE DATA PROTECTION LAWS

- 3.1. The Data Protection Act 1998 ("DPA") applies to any personal data that we process, and from 25th May 2018 this will be replaced by the General Data Protection Regulation (GDPR). In the UK, once it has passed the relevant stages of parliamentary approval the Data Protection Bill will become the Data Protection Act 2018 (DPA 2018) and will strengthen and extend the provisions of GDPR.
- 3.2. This Policy is written as though GDPR and the DPA 2018 (together "Data Protection Laws") are both in force.
- 3.3. The Data Protection Laws all require that the personal data is processed in accordance with the Data Protection Principles (on which see 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. BRITISH CANOEING COMPLIANCE

4.1. British Canoeing is registered as a data controller with the Information Commissioner's Office (ICO) and has had 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 GDPR. British Canoeing will comply with its obligations under the 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 the following six principles:

- 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;

5.2. 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. DATA PROTECTION RIGHTS

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

- 6.1.1. The rights to access their personal data, usually referred to as a subject access request;
 - 6.1.2. The right to have their personal data rectified;
 - 6.1.3. The right to have their personal data erased, usually referred to as the right to be forgotten;
 - 6.1.4. The right to restrict processing of their personal data;
 - 6.1.5. The right to object to receiving direct marketing materials;
 - 6.1.6. The right to portability of their personal data;
 - 6.1.7. The right to object to processing of their personal data; and
 - 6.1.8. The right to not be subject to a decision made solely by automated data processing.
- 6.2. Not all of these rights are absolute rights, some are qualified and some only apply in specific circumstances.
- 6.3. Anyone wishing to exercise any of these rights should apply in writing to the DPO. Any member of British Canoeing staff receiving any such request shall forward it to the DPO.
- 6.4. When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:
- 6.4.1. We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
 - 6.4.2. 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.
- 6.5. Our employees will refer a request to their Line Manager or the DPO for assistance in difficult situations. British Canoeing will not tolerate any harassment or intimidation of its employees who are carrying out their duties in accordance with this policy.

7. SECURITY

- 7.1. British Canoeing 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.
- 7.2. British Canoeing has a separate Employee and Key Volunteer 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. British Canoeing will ensure that all personal data is accessible only to those who have a valid reason for using it. British Canoeing 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.
- 7.3. 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 a month's worth of data at any one

time). Records of these are kept. Backups are kept off site. Backups are verified regularly by the software and system supplier.

7.4. Master copies of software are stored off site or in a heat-proof safe.

7.5. Firewalls and virus checkers are kept up to date and running and users are trained in virus avoidance and detection.

7.6. 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.

8. CONTACT US

8.1. The Data Protection Officer (DPO) is responsible for ensuring compliance with the Data Protection Laws and with this policy. This post is held by Urvasi Naidoo, Head of Governance and Compliance (0115 8968842) (urvasi.naidoo@britishcanoeing.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.

9. REVIEW

9.1. We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or email.

9.2. The Policy will be reviewed every three years.