

# PADDLE UK PRIVACY NOTICE FOR OUR PARTICIPANTS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after you participate with us. This notice explains how we comply with the law on data protection, what your rights are for the purposes of data protection. In some most instances we will be the data controller but in others we may be the data processor of your personal information.

This notice applies to your participation within any Paddle UK<sup>1</sup> activity or event that you enter/take part in including:

- Events that Paddle UK directly run and take bookings
- Events that are run through Paddle UK Discipline committees
- Events that are run through Paddle UK regional development teams
- Events that are delivered through Paddle UK programmes (e.g. Go Paddling), run by Paddle UK Clubs, Delivery Centres and recognised programme providers.

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 company registration number 1525484.

We 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 information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses, home address and telephone numbers;
- o date of birth:
- o gender;
- o 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;
- o 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;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any activities, events and/or competitions hosted by us; or our affiliated clubs, Quality Marked centres or recognised programme providers
- images at events (e.g. Club Conference, AGM) and/or competitions in video and/or photographic form and voice recordings; and

<sup>&</sup>lt;sup>1</sup> Paddle UK is a trading name of British Canoeing which is a Company registered at Companies House with the registered number 01525484.



 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
- o information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- o information about your emergency contact including name and telephone number
- We may not collect all of the above types of special category 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".

# 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our participants when you take part in a Paddle UK activity, event or competition. 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 phone, e-mail or in some other way.

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 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 those of them whom you feel are sufficiently mature to understand it. They also have the same rights as 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		
All Participants				
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.		



To administer and process your event entry.	Personal details, health and emergency contact details. To allow us to process your entry and safely manage the running of the event.	Legitimate Interest to ensure we can process your entry and manage an event safety and effectively.
To conduct data analytics studies to better understand event attendance and trends within the sport.	Records of your attendance at any activities, events or competitions hosted by us or through our programmes delivered by Paddle UK affiliated clubs, Quality marked centres and recognised programme providers.	We have a legitimate interest in doing so to ensure that we can monitor participation trends and monitor the success of our event based programmes.
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, participation products and information about our commercial partners	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so
To publish event results or completion of challenges on leader boards	Your name, age category and event/challenge result published on the Paddle UK website.	Where you have given us your explicit consent to do so
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.
To make sure we are fairly offering opportunities to everyone.	Name, Date of birth, gender, information which part of the world you or your family are from, details about your health.	It is in our interests to make sure we provide you and others like you with the same opportunity to get into sport no matter who you are and where you come from  If we use any 'special information', we will only do so on the basis of one of the 'special reasons' we talked about 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.



For the purposes of	Images in video and/or	Where you have given us your explicit
promoting the sport, our	photographic form.	consent to do so.
events and membership		
packages.		

For some of your personal information we 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 administer your event entry and/or 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 administer your event entry and/or be able to properly perform our contract with you.

#### 5. DIRECT MARKETING

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about paddle sports 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. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

# 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you.
- To any National Association for Canoeing in the UK, Disciplines or Regional bodies for the sports covered by Paddle UK: to allow them to properly administer the sports on a local, regional, national and UK level.
- Other service providers: for example, email marketing specialists, payment processors, data analysis 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/Event Partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners relevant to the events you have participated where you have given your express consent for us to do so
- 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.



We do not disclose personal information to anyone else except as set out above.

# 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. 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 10 years after your last contact with us. Exceptions to this rule are:

Information that may be relevant to personal injury claims, 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 worked for us.

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 by emailing us at <a href="mailto:gdpr@paddleuk.org.uk">gdpr@paddleuk.org.uk</a>. 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;
- o 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;
- o 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 <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>.



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 or your local data protection regulator.

#### 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

Nancy Squires Director 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 <a href="mailto:nancy.squires@paddleuk.org.uk">nancy.squires@paddleuk.org.uk</a> or write to her at Paddle UK, National Water Sports Centre, Adbolton Lane, Holme Pierrepont, Nottingham, NG12 2LU.