



Worthing Excelsior Cycling Club GDPR & Data Privacy Policy

Our Commitment to Your Privacy

Worthing Excelsior Cycling Club is committed to respecting the privacy of our members and protecting their personal information. We take our responsibilities under data protection law seriously. This policy outlines how the Club collects, uses, and secures the personal information you provide to us before, during, and after your membership. It also explains your legal rights in relation to this information.

This document will first formally identify the Club as the controller of your data and provide the necessary contact details for any data protection matters.

Who We Are and How to Contact Us

It is important that you know who is responsible for your personal information and how you can get in touch with any questions or concerns.

Worthing Excelsior Cycling Club is the 'controller' of the personal information that we hold about our members. This means we are responsible for deciding how your information is used and for ensuring it is protected.

Worthing Excelsior cycling club uses **membermojo**, which provides online membership services for our organisation. In data protection terms they are the data processor for our organisation member data, and we as the organisation is the data controller. They provide the tools and controls that help implement our organisation's GDPR compliant privacy policy for managing personal member data.

The responsibility for all data protection matters within the Club is the committee. The primary point of contact would be the Club Secretary; secretary@worthingexcelsior.co.uk

Please note that while the Club has not appointed a formal Data Protection Officer (as we are not legally required to do so), the Committee has overall responsibility for our data protection compliance.

The Personal Information We Collect

To effectively manage your membership, organise events, and run the Club, we need to collect and process certain personal information. The information we typically collect from you when you apply to become a member includes:

- Personal contact details that allow us to contact you directly, such as name, title, postal address, email addresses, and telephone numbers
- Date of birth and gender
- Membership start and end dates
- Records of your attendance at any events hosted by us
- Images in video and/or photographic form
- Details of next of kin, family members, and emergency contacts

- Any disciplinary and grievance information

Information About Others

If you provide us with details for next of kin or emergency contacts, you must share this privacy notice with those individuals. Please share this privacy notice with those you feel are sufficiently mature to understand it. They have a right to know how we hold and use their personal information and have the same rights as any member.

We do not collect any 'special categories of personal information' about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

How and Why We Use Your Information (Our Lawful Basis)

We only use your personal information when we have a valid legal reason to do so, which is known as a 'lawful basis' under data protection law. This section clarifies the specific purposes for which we use your data and the lawful basis that permits us to do so.

The table below describes our main data processing activities

Purpose	Personal Information Used	Our Reason (Lawful Basis)
To administer your membership and manage our relationship with you.	All contact and membership details.	This is necessary to properly manage and administer your membership contract.
To send you information regarding competitions and events.	Contact and membership details.	This is necessary to properly manage and administer your membership contract.
To send you newsletters and other information we think you might find useful.	Contact details.	This is necessary to properly manage and administer your membership contract.
To answer your queries or handle complaints.	Contact details.	We have a legitimate interest to provide complaint handling services.
For the retention of Club records and competition results.	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. In some cases, we may also have legal or regulatory obligations to retain records.
To conduct data analytics to understand event attendance and trends.	Records of your attendance at any events or competitions.	We have a legitimate interest in ensuring our membership offerings are targeted and relevant.
To promote the Club, our events, and membership packages.	Images in video and/or photographic form.	We have a legitimate interest in promoting the Club for the benefit of all members.
To comply with health and safety requirements.	Records of attendance.	We have a legal obligation and a legitimate interest to provide a safe environment for participation.
To gather evidence for possible grievance or disciplinary hearings.	All the personal information we collect.	We have a legitimate interest in providing a safe and fair environment and managing disciplinary matters effectively.

If you fail to provide us with the personal information required to manage your membership, we may not be able to admit you as a member or may have to terminate your membership.

Who We Share Your Information With

The Club does not sell your personal information. We only share it with specific third parties when it is necessary to run the Club, deliver events, or when we are legally required to do so. These parties include:

- **Club Service Providers:** Our website and email providers, membership and event-entry systems, and timing/results providers.
- **Governing Bodies:** Relevant cycling governing bodies where required for affiliation or event management.
- **Club Administration:** Committee members and key volunteers who are responsible for the administration of the Club and need access to your information to perform their roles.
- **Legal and Governmental Authorities:** The Government, regulators, police, law enforcement, and security services, where we are required to do so by law or to assist with their investigations.

All our third-party service providers are required to keep your information secure and are only permitted to use it for the purpose of providing services to the Club. They are not permitted to use your data for their own purposes.

Keeping Your Information Secure

We are committed to the security of your personal data and have implemented appropriate technical and organisational measures to protect it. These measures are designed to prevent your information from being accidentally lost, used, or accessed in an unauthorised way.

Our security measures include:

- Limiting access to your personal information to only those committee members and key volunteers who have a genuine need to see it for their roles.
- Using password-protected accounts and systems to secure all digital records.
- Keeping any paper records we hold in secure locations.

How Long We Keep Your Information

We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected. Our retention periods are as follows:

- **General Membership:** Your personal details are retained for the duration of your membership with the Club.
- **Race/Event Entry:** Personal details submitted for entry to any race or event will be held for 4 years after that event has been completed. However, if there has been an accident involving a competitor under 18 years of age, their details will be held for 4 years after the date that competitor has attained the age of 18 years.
- **Club History/Records:** For the purposes of maintaining Club history and competition records, your personal details will be held for the period that the record remains, which may be after you have left the Club.
- **Legal Claims:** Information that may be relevant to personal injury or discrimination claims may be retained until the legal limitation period for those types of claims has expired.

It is your responsibility to ensure that the information we hold about you is accurate and up-to-date. Please let us know if your details change.

Your Data Protection Rights

Under data protection law, you have specific rights over your personal information. These rights are designed to give you control over how your data is used. This section outlines what those rights are and how you can exercise them. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

You have the following rights:

- **The right to be informed:** You have the right to know how your personal information is being used. This privacy policy is intended to provide you with that information.
- **The right to access:** You have the right to request a copy of the personal information we hold about you.
- **The right to correction:** You have the right to request that we correct any inaccurate personal information we hold about you.
- **The right to erasure:** You have the right to request the deletion of your personal information in certain limited circumstances.
- **The right to restrict processing:** You have the right to limit how we use your personal information in certain situations.
- **The right to object to processing:** You have the right to object to us processing your personal information, for example, where we are relying on our legitimate interests.
- **The right to data portability:** You have the right to request that we transfer elements of your data either to you or to another service provider.

How to Exercise Your Rights

To exercise any of these rights, please contact the Data Protection Compliance Manager using the contact details provided in Section 2 of this policy. We will respond to your request without undue delay and within one month. Before we act on your request, we may ask you to confirm your identity to ensure the security of your information.

Important Information for Junior Members (Under 18)

Where we hold information about members or competitors who are under the age of 18, this information is normally collected from their parent or guardian. All communication regarding a junior member will be conducted through their parent or guardian.

A child's personal information will only be used for the purposes of managing their membership, ensuring their safe participation in Club activities, and for administration. Where specifically required by data protection law, we may ask for parental consent to process a child's information.

Other Important Details

This section covers a few other specific points about our data practices.

- **Consent:** Where we rely on your consent to process your information (for example, for the use of optional photos), you can withdraw that consent at any time by contacting us. Please note that withdrawing consent will not affect any use of your data that took place before you withdrew it, but it may mean we cannot provide certain benefits to you.
- **Direct Marketing:** The Club will not engage in any direct marketing activities.
- **Automated Decision-Making:** We do not use your personal information to make any automated decisions that have a legal or similarly significant effect on you.
- **International Transfers:** The Club will not transfer your personal information internationally.

What Happens in a Data Breach?

We take data security very seriously. In the unlikely event of a personal data breach, we have procedures in place to manage the situation effectively.

If we become aware of a breach, we will investigate promptly and take immediate steps to reduce any risk to our members. Where required by law, we will notify the Information Commissioner's Office and, where appropriate, the individuals affected by the breach.

Changes to This Policy

This privacy policy may be updated from time to time to reflect changes in the law or our data processing practices.

For any significant changes, we will try to provide reasonable notice to our members. Where required by law, we will seek your consent for any new or different ways in which we use your personal information.

Questions and Complaints

If you have any query or complaint regarding the information we hold about you, we encourage you to contact us first so we can resolve the issue directly. In that event please email the club secretary: secretary@worthingexcelsior.co.uk

If you are unhappy with our use of your personal information or our response to your complaint, you have the right to complain to the UK's data protection authority, the Information Commissioner's Office (ICO). For more information, please visit the ICO's website: <https://ico.org.uk/for-the-public/>.