



## **WIMBORNE AND DISTRICT ANGLING CLUB PRIVACY NOTICE AND DATA REGULATION POLICY**

### **Summary of how we use a member's data**

- Wimborne and District Angling Club (WDAC) uses personal data information to manage and administer memberships, any individual member's involvement with its activities, and to keep in contact for these purposes.
- Some data is obtained by tackle shop outlets when a new, or renewing, member chooses to use such a facility and completes a written application, because the relevant establishment holds the WDAC application forms. This circumstance also applies to the outlets that sell guest and trout fishery tickets on WDAC's behalf. These premises understand this information is being held on behalf of WDAC. WDAC routinely collects this information as part of its day-to-day administrative processing of the Club's activities.
- Amongst the data WDAC collects will be personal information such as an email address which can identify an individual. WDAC will hold this information (or, in the case of a minor, that of the appropriate parent or guardian) for all who have a membership.
- WDAC members often acting as Club officials in some capacity, such as bailiffs (but not exclusively), may use mobile phones, CCTV/camera traps, and bodycams to gather photographic data and may hold identifiable visual records of individuals and their possessions in connection with Club activity. And these images may be transmitted and then used in relation to both Club information and newsletters, and on occasion disciplinary matters.
- Where a member works in a particular role, that person may be required to undergo a Disclosure & Barring Service [DBS] check using the national eDBS system. The result of this check will be retained securely.

### **What does this policy cover?**

This policy describes how WDAC will process information in relation to its members and include use of these details and photographs for the purposes of recognition and reporting catches and match results, and publicity relating to any awards presentation or event organised by WDAC.

It also describes any individual's data protection rights, including a right to object to some of the processing which WDAC carry out. More information about any member's rights, and how to exercise them, is set out in the "What rights do I have?" section.

## **What information does WDAC collect?**

WDAC will collect and process personal data (or collect and process personal data from a parent or appointed adult, if the person concerned is a 'minor' member), when joining and when renewing membership. This includes:

- name;
- home address, email address and phone number(s);
- date of birth;
- type of membership, any particular interest (game or coarse, match etc.) and also any particular office, if the person concerned holds one for the Club, such as bailiff or committee member;
- payment and/or bank account details, where provided to make a payment for membership or for a particular event;
- some information, including photographic information, will be generated as part of a member involvement with WDAC, in particular data about an individual catch, involvement in a working party or an event, and in Club Committee Agendas and Minutes particularly if actively involved in the Club.

## **What information do we receive from third parties?**

WDAC may receive information about a member from third parties. For example, if you are a 'minor,' WDAC may be given information about you by your parents.

Additionally, for certain role holders, or those working with children, WDAC may receive information from those agencies who provide DBS checks.

[Normally, the need for this information and its use will have been agreed in advance with the Member to maximise transparency of the need for it].

## **How do we use this information, and what is the legal basis for this use?**

We process a Member's personal data for the following purposes:

- To fulfil a contract because payment is made to provide access to fishing facilities and the associated land available, or take steps linked to a contract: this is relevant where a member makes a payment for membership or enters a competition. This includes:
  - taking payments;
  - communicating with a member in any form;
  - providing and arranging the delivery or other provision of activities, competition prizes or services;

- As required by WDAC's constitution or as required by specific circumstances to conduct WDAC business and pursue the Club's legitimate interests, in particular:
  - manage and administer an individual's membership;
  - maintain records and history, including awards and event reports;
  - use photographs of members to publicise working parties, catches and similar matters.
  - take disciplinary action against a member in relation to breaches of the Club's constitution and/or rules.
- Where you give WDAC consent:
  - WDAC may handle medical or disability information you or your parent or guardian provides to the Club for particular activities;
  - on other occasions where WDAC asks for consent, WDAC will use the data for the purpose which is explained at that time, such as, for example, signing off on a risk assessment in relation to a working party activity;
  - identify individuals, their imagery and content on social media.
- For purposes which are required by law:
  - maintaining accounting records;
  - ensure, where a member works with children, that an appropriate DBS check has been carried out [this is also carried out with consent].
  - respond to requests by government or law enforcement authorities conducting an investigation.

### **Withdrawing consent**

Wherever WDAC rely on a member's consent, there will always be the opportunity to able to withdraw that consent, although WDAC may have other legal grounds for processing personal data for other purposes, such as those set out above. In some cases, even where WDAC are able to use member information without consent because of a legitimate Club interest, WDAC will remove details on request.

### **Who will WDAC share this data with, where and when?**

Some limited information may be shared with other stakeholders such as the Angling Trust or the Environment Agency.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

## **How long will WDAC keep data?**

WDAC processes personal, non-photographic, data in relation to its active members and for two years after the membership has expired. Personal information on the Club's copy of guest and trout tickets will be destroyed after a year. The destruction itself will be secure. Photographic images on the Club's website and Facebook pages will be removed only at the request of the individuals appearing in these images unless it is part of the general management updating these forms of electronic communication.

Where a member or recent member is the subject of a disciplinary investigation and this results in dismissal from the Club, or some other relevant outcome, the Club will continue to hold the relevant data to ensure that the data record leading to the decision is not under-mined by disposal of the relevant data, which would otherwise be subject to a general time limit.

Where the member's personal record is engraved on a Club trophy or in the Club's minutes it will be held in perpetuity. [Paper records of minutes and agendas are not considered to be data for current purposes because the manual filing system in which these records are held does not hold personal data that can be accessed by specific criteria].

## **What rights does a Member have?**

A member has the right to ask for a copy of their personal data; to correct, delete or restrict (stop any active) processing of personal data; and to obtain the personal data provided to the Club for a contract or with the member's consent in a structured, machine-readable format.

In addition, any member can object to the processing of personal data in some circumstances (in particular, where WDAC do not have to process the data to meet a contractual or other legal requirement).

These rights may be limited, for example if fulfilling a request that would reveal personal data about another person, or if a member asks to delete information which WDAC is required by law to keep or have compelling legitimate interests in keeping; for example, if investigating a significant breach of WDAC rules.

## **What rights do past Members have?**

Past members will have the same rights as existing members.

## **How do I get in touch?**

WDAC aspire to satisfy any queries a member may have about the way data is processed. If any member has any concerns about the way data is processed, please contact the Club Secretary at [secretary@wimborneanddistrictanglingclub.co.uk](mailto:secretary@wimborneanddistrictanglingclub.co.uk)