

## **Welwyn Wheelers - Data Privacy Notice**

16/08/2020 v1.2

### **Scope**

This document provides you with information about how we are handling, or are intending to handle, your personal information:

If you are aged 16 or under, please get your parent/guardian's permission before you provide any personal information to us.

### **About us**

Welwyn Wheelers is an inclusive racing club and is committed to protecting and respecting your privacy and complying with the principles of applicable data protection laws. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The data controller of the personal data referred to in this policy is Welwyn Wheelers CC, Gosling Sports Park, Stanborough Road, Welwyn Garden City, Herts, AL8 6XE

### **Collection of personal data**

Welwyn Wheelers may collect and/or create or otherwise obtain and process the following data about you:

- Information about you that you provide by filling in forms while registering for membership or forms completed for activities provided by the club. This information may include Name, date of birth, address, e-mail address, phone number, gender, emergency contact, disability and relevant health information.
- On occasion, we may collect personal data from non-members e.g. any non-member participant who fills in a health disclaimer or form at a taster event.

This information is primarily that provided at the time of registering your membership with Welwyn Wheelers, subscribing to our social media communications, posting any material on our social media feeds, booking onto rides, entering, attending and volunteering at events.

- We may also ask you for information when you report a problem or make a complaint and, if you contact us, we may keep a record of that correspondence. This is particularly relevant for safeguarding information.
- We may also ask you to complete optional surveys to gather feedback on the club.
- Details of when you digitally interact with Welwyn Wheelers via our websites and other digital channels and the resources that you access which may include the use of cookies.
- Information about emails and other communications we have sent to you and your interaction with them.

### **Uses made of your information and the basis of processing**

Welwyn Wheelers will use your personal information to:

- Share information with club coaches to manage training sessions
- Support you in joining events and rides.
- Enable you to communicate with the wider Welwyn Wheelers groups via Social Media etc. Such as Facebook, WhatsApp, Twitter. Members are free to join these pages. If you join one of the social media pages, please note that the provider of the social media platforms have their own privacy policies and that Welwyn Wheelers do not accept any responsibility or liability for these policies.
- Notify you about changes to training, events coming up and club news.
- Publish and maintain results for different cycling events e.g. club 10, track league etc.
- Invite you and any legal guardians to any club social events.
- Communicating with you about the selling of club kit.
- Respond to requests for contact details from legitimate public health authorities, in relation to the Government's COVID-19 contact tracing scheme.

The legal basis on which we collect and process the personal data described above depends on the personal information concerned and the specific context in which we collect it. However, we will only use your personal information where we:

- Have your consent to do so;
- Need to process your personal information for our legitimate interests and only where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms;

### **Information security**

Welwyn Wheelers will take all steps reasonably necessary to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice. Unfortunately, the transmission of information via the internet is not completely secure and, although we will do our best to protect your personal data transmitted to us via the internet, we cannot guarantee the security of your data transmitted to our website from your device. Any transmission is at your own risk.

If you choose to sign-up with Facebook/Twitter when you register on our website, Welwyn Wheelers may access your personal data in your Facebook/Twitter account, depending on your settings, and we may post information submitted on our websites to Facebook/Twitter who will store such information in the United States. The EU has not endorsed the privacy laws of the United States but has approved a framework for the transfer of personal data called the EU:US Privacy Shield under which Facebook/Twitter has a valid certificate enabling us to lawfully transfer your personal data to Facebook. You may review [Facebook/Twitter's Privacy Shield certificate here](#).

### **Data retention period**

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- As long as you remain a subscribed member of Welwyn Wheelers and use our services (including attending coaching sessions, engaging with emails, entering cycling events,

posting news etc. ) we will retain and process information about you. In such cases, you will be considered to be an 'active' member. If you have not been 'active' as a member for a period of one-year Welwyn Wheelers will remove you from the membership database and you will be required to reapply via the British Cycling website.

- Any hardcopy paperwork or electronic files associated to your previous membership will be retained by the club for a period of 3 years. After this time it will be deleted or in the case of hardcopy shredded.
- We will also retain any data relating to any cycling event results. This would be no more than name, age category and gender alongside details of the event in which an individual took part.
- Personal data linked to the processing of insurance claims, subject access requests, disputes, safeguarding investigations, disciplinary or police matters will only be kept for as long as it necessary for those purposes, as each is applicable.

### **IP addresses and cookies**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

In addition to the above we use third party cookies and pixels to advertise British Cycling and our products across the internet (for example via Google AdWords Remarketing and other services). Remarketing will display relevant adverts tailored to you based on what parts of the British Cycling website you have viewed by placing a cookie on your machine. This does not in any way identify you or give access to your computer. Remarketing allows us to tailor our marketing to better suit your needs and only display adverts that are relevant to you.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Site. You can see a [full list of cookies used on our websites here](#).

### **The data subject's rights**

Data protection laws grant you, as a Data Subject, certain 'information rights', which are summarised below:

- **Right of access** - You have the right to obtain a copy of information we hold about you
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.

- **Right to restriction of processing** - You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- **Right to Portability** - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- **Right to Object** - You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests.
- **Right to Withdraw Consent** - You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.
- **Right of Complaint** - You also have the right to lodge a complaint about any aspect of how we are handling your data with the *UK Information Commissioner's Office*, which can be contacted at [www.ico.org.uk](http://www.ico.org.uk).

### **Changes to our privacy policy**

Any changes we may make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by date-stamped communication.

### **How to contact us**

If you wish to contact us about your personal data or exercise any of the rights described above please contact: [welwyn.membership@gmail.com](mailto:welwyn.membership@gmail.com)