

Marazion Angling Club (the Club) - Privacy and Data Protection Policy

The Club is committed to protecting and respecting the privacy of its members. The Club uses Clubmate <https://clubmate.fish> to administer its membership. This requires members/prospective members to have an email address and provide information online. As Clubmate is the data controller, it is imperative that all members read Clubmate's privacy statement found here <https://clubmate.fish/privacy/?v=79cba1185463> and their software will store and process the data for the Club. The Club is responsible for ensuring the data is used in a fair, lawful, secure and transparent way and is registered with the Information Commissioner's Office, as is required under UK law.

How does the Data Protection Act 2018 affect the records kept by the Club?

The Data Protection Act 2018 controls how your personal information is used by the organisation. Everyone responsible for using collecting and using personal data has to follow strict rules called the "Data Protection Principles". They must ensure the information is:

- Used fairly, lawfully and transparently.
- Used for specified, explicit purposes.
- Used in a way that is adequate, relevant and limited to only what is necessary.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary.
- Handled in a way that ensures security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

Under the Data Protection Act 2018, you have the right to find out what information the organisation stores about you. These include the right to:

- Be informed about how your data is being used.
- Access personal data.
- Have incorrect data updated.
- Have data erased.
- Stop or restrict the processing of your data.
- Object to how your data is processed in certain circumstances.

What type of information does the Club collect?

The information you give us, via Clubmate, may include your name, date of birth, address, e-mail address, phone number and gender. Your membership page on Clubmate will allow you to control your personal data.

You may also give us information about yourself by corresponding with us by telephone, e-mail or otherwise. This includes information you provide when you apply for membership of the Club or elect to join the Club's membership waiting list. The Club will not retain any personal information, this will be stored on Clubmate, entered by yourself or a club member.

As members will be paying for membership online, Clubmate will also require certain financial information, which includes bank account and payment card details. The Club has no access to this information. Clubmate uses Stripe, an internet payment system, who are fully regulated by the [Financial Conduct Authority](#) (FCA), to transfer monies to the Club's bank account and to do this your financial information is shared with Stripe. The Club receives payments from Stripe and no individual's information is shared in this process. Stripe's privacy statement can be found here: stripe.com

To protect members' data Clubmate have in place physical, electronic and managerial procedures to safeguard and secure data at all times. All member information is stored and maintained with multi-layered security provided by Microsoft Azure across physical data centres, infrastructure and operations. And when data is transferred between the Clubmate server and the member's computer it uses the same SSL technology as banks and financial institutions to ensure it remains protected. No sensitive financial information (bank details, debit or credit card information) is ever seen, stored or transmitted by the Club or Clubmate. This data is always held securely by their payment partner [Stripe](#).

The Club also uses CCTV Systems to record images to assist in the provision of a safe and secure environment, and for the protection of our property.

The Club, or Clubmate, will notify you promptly in the unlikely event of any breach of your personal data which might expose you to serious risk.

Where a member suspects a breach of data protection has arisen, the member must immediately bring this to the attention of the Secretary.

Why does the Club collect personal information?

The reason the Club needs your personal data is to be able to administer your membership and provide the membership services you are signing up to when you register with the Club. The Club's lawful basis for processing your personal data is that it has a contractual obligation to you as a member to provide the services you are registering for.

Reasons the Club needs to process your data include:

- Maintaining current and accurate membership records.
- Maintenance of the Club's membership waiting list and issuing invitations for membership.
- Processing of membership forms, applications and payments.
- Issuing membership cards and associated club information.
- Circulation of Club notices and newsletters, including membership renewal information.
- General member communications relevant to the running of the Club, maintenance of the Club's fisheries and Club-related information of interest to members.
- Corresponding with an individual member – for example in the event of a breach of Club rules.
- Analysing anonymised data to monitor Club membership trends.

and monitoring of CCTV Systems helps the Club to:

- maintain public safety;
- maintain the security of its property;
- assist in the prevention of crime;
- reduce the fear of crime and offer reassurance; and
- facilitate the apprehension and prosecution of offenders in relation to crime.
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The Club considers the processing of personal data for these purposes to be in its legitimate interests.

From time to time the Club may share with members information received from third parties when such information is considered by the Club Committee to be relevant to the interests of the club and its members.

How does the Club store my information?

As Clubmate is the data controller, the following is their statement on data retention:

"We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you."

The Club will hold your personal data electronically within the Clubmate system for as long as you are a member of Clubmate and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. The Club will review your personal data every year to establish whether it can continue to be processed. If the Club decides that it cannot continue to allow it to be processed, it will stop any processing of your personal data.

Inactive Clubmate accounts (i.e. no transactions) for at least twelve months from the date they were opened will be closed and all personal data held within them deleted. This does not apply to accounts on the waiting list.

CCTV Camera Locations

CCTV cameras are located at strategic points so as to provide coverage of activity at our facilities. Where required by privacy laws, signage is displayed at appropriate points to alert visitors that CCTV surveillance is in use and to provide our contact details for further information.

Control of CCTV Access

Access to our CCTV Systems and any associated recorded images which contain personal information ("Recorded Materials") is controlled and is limited to those who need to have access in accordance with this policy.

Recorded Materials may be used by us after an incident to assist in the identification and detection of offenders or in the investigation of a security incident.

Any Recorded Materials will not be placed in areas easily accessible by visitors (other than those with requisite access rights), the public or be otherwise distributed.

We will take reasonable precautions necessary to protect Recorded Materials from:

- a. misuse, interference and loss; and
- b. unauthorised access, modification or disclosure.

Storage of CCTV footage

CCTV images and Recorded Materials shall not be retained for any longer than is required for the stated purpose. Ordinarily footage is only retained for as long as is necessary to fulfil the stated purpose. Recorded Materials will be deleted securely and promptly once the stated purpose has been fulfilled.

Is information passed to third parties?

As Clubmate is the data controller, they state:

“We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.*
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.*
- Where we need to comply with a legal or regulatory obligation.*
- Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.”*

Further information can be found in Clubmates' privacy statement (link above).

Your details may also be passed via Clubmate, to Mailchimp, whose privacy policies can be found at [Mailchimp Data Security and Privacy | Mailchimp](#), in order to send you membership related communications including newsletters and club notices.

The Club will not supply any personal data held on Clubmate to any third party for dissemination or sale to external parties for marketing or any other commercial purposes.

Disclosure of CCTV Recorded Materials will only be provided to third parties for the purposes outlined above and in compliance with applicable data privacy laws.

The police may require or be provided with access to any of the Club's CCTV Systems under the following circumstances;

- emergencies or investigation of serious incidents;
- identification of offenders; or
- at our request (in accordance with this policy).

Match/Event results/records

The Club will process any personal data collected for the purposes of any club match in line with the club's privacy/data protection policy. Where a person participating in any club activity is not a paid-up member of the Club, the persons explicit consent will be obtained from the person prior to the individual's personal information being used in relation to the promotion or publicity of any such club match/event.

How to find out what data the Club holds about you

As Clubmate is the data controller, the following is their statement on data retention:

“Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data.

Request correction of your personal data.

Request erasure of your personal data.

Object to processing of your personal data.

Request restriction of processing your personal data.

Request transfer of your personal data.

Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact Clubmate.”

On your personal page on Clubmate, you can modify your personal data at any time and change your marketing preferences. As a data subject you are not obliged to share your personal data with the Club, via Clubmate. However, if you choose not to share your personal data with us, the Club may not be able to register or administer your membership.

Members who choose not to access their own data through the member portal of Clubmate, or require data not held by Clubmate, can request either verbally or in writing to access their data and must be responded to within one month of the request. All requests will be directed to the Secretary who will respond within the timescale. A record will be kept for management purposes of each request received.

As a data subject you may have the right at any time to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

You have the right to have your personal data erased in certain circumstances (please note that if you elect to have your personal data erased this will immediately terminate your membership at no cost to the Club).

The Club reserves the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website or your Clubmate page regularly for any amendments (but amendments will not be made retrospectively).

How to make a complaint

If you think your data has been misused or has not been kept secure, please contact the Club Secretary in the first instance. If you are not happy with the response provided, please contact the Information Commissioners Office (ICO):

Information Commissioners Office
Wycliffe House Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

icocasework@ico.org.uk