VC COLETS PRIVACY POLICY

This policy explains how VC Colets uses your personal information when you become a member of our cycle club. It also describes how long that information is kept and the circumstances in which we might disclose it to a third party. The information that we hold is used solely to enable us to run the club effectively and manage our relationship with you.

If you are not already a member of British Cycling when you join or renew your membership with VC Colets you will be registered for an online account with British Cycling. We will provide British Cycling with your personal data which they will use to enable access to an online portal for you (called My Dashboard) on the British Cycling website. British Cycling will use your personal data in accordance with its Privacy Notice which can be <u>accessed here.</u> British Cycling will contact you to invite you to sign into and update your dashboard (which, amongst other things, allows you to set and amend your privacy settings). If you have any questions about the continuing privacy of your personal data when it is shared with British Cycling, please

contact compliance@britishcycling.org.uk.

As a club member, your information may be shared on the club website, social media pages or in emails sent by the club. This data will only be shared if either you are a club volunteer, have participated in a race or challenge event or have recorded a major achievement. This data will be limited to your name, race results (if applicable) and details of your achievement. Limited further information about you may be included; for example, whether you have participated in a juniors' race or a women's race.

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The personal information we hold includes:

- Name, address, date of birth, telephone number(s), email address, gender
 & British Cycling membership number.
 - The number of club rides that you have attended How we use personal information:

VC Colets and any companies that process data on our behalf such as British

Cycling will use your personal information purely for membership

administration.

The information provided will be used to:

- Allow us to monitor how many people are attending club rides
 - Communicate with you regarding membership renewals
- Communicate with you regarding forthcoming events and club ride details such as changes of start time or cancellations via Facebook or Whatsapp

groups

- Join in with club based Strava leaderboards and challenges
- Fulfil our duties towards British Cycling as an affiliated club

Your information will only be accessed and processed only by authorised representatives of VC Colets who are directly involved in the management and administration of our members and have a legitimate need to access your information.

Length of time we keep information:

Your personal information will be retained by VC Colets for the duration of your membership plus an additional one month from the date on which you cease to

be a member. After this time, your details will be destroyed.

Protection of your personal information:

We take the privacy of our members very seriously. Access to systems that hold personal membership information is restricted to authorised personnel through the use of unique identifiers and passwords. Your information is stored on systems that are protected by secure network architectures and are backed up regularly (to a second secure location) for disaster recovery and continuity purposes and to avoid the risk of inadvertent erasure or destruction.

Sharing personal information:

We have links with British Cycling and Colets Health and Fitness Club. These third parties will process membership information in accordance with our instructions and make decisions regarding the information as part of the delivery of their services. They are also required to put in place appropriate security measures that ensure an adequate level of protection for personal information.

In some circumstances, disclosures of personal information to the police (and other law enforcement agencies) are permitted if they are necessary for the prevention or detection of crime and/or the apprehension or prosecution of offenders. Each police request to VC Colets is dealt with on a strict case by case basis to ensure that any such disclosure is lawful and proportionate. VC Colets may also disclose small elements of your personal information to a third party:

Where we have your explicit consent

- Where we are required to do so to allow you to have access to ride information, such as on a Facebook page
- In an emergency where the health or personal security of a member is at

risk

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- Where we are required to do so by law (e.g. in response to a court order, or to assist with investigations carried out by HM Revenue and Customs, the Department for Work and Pensions, Job Centre Plus, the Child Support Agency, or local authorities)
 - In connection with the National Fraud Initiative (NFI) data matching exercise carried out by the National Audit Office, which is intended to prevent/detect crime and protect public funds
 - If it is necessary to do so in order to defend our legal rights (i.e. in the

context of a court case invo

- lving VC Colets)

Overseas processing:

Your personal data will not be transferred outside of the UK.

How to access personal information:

Please make all access requests to Chris Dain. See below for contact details.

Your rights:

Under the General Data Protection Regulation (GDPR) and The Data Protection

Act 2018 (DPA) you have a number of rights with regard to your personal data.

These include:

- The right to be informed – we are doing this by publishing this privacy

policy

- The right to request access to data we hold on you
- The right to rectification if the data that we hold is incorrect or outdated
 - The right to the erasure of your personal data
- The right to restrict processing or withdraw your consent for processing at

any time

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- The right to data portability (transfer to another data processor)

- The right to object to data processing

 The right to complain to the Information Commissioner's Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data. You may also complain to the data processor named below.

Legal basis for processing your information:

We process your data on the legal basis of 'legitimate interest.' We believe that it is in the interests of our members and VC Colets cycling club to hold the information that we have detailed above to run our club effectively. Identity and contact details of data processor The person with overall responsibility for data processing within VC Colets is Chris Dain. Chris can be contacted at: 50 Station Road, Thames Ditton, Surrey KT7 0NS 07785 280145 or 020 8398 0800