

Wokingham Waterside Centre:

DATA PRIVACY NOTICE

Wokingham Waterside Centre (WWC) is committed to protecting and respecting your privacy. This policy (together with our terms and conditions and any other documents referred to on it) 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 rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Wokingham Waterside Centre is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: office@wokinghamwatersidecentre.com, Thames Valley Park Drive, Earley, RG6 1PQ. For all data matters contact Kathryn Hall on 01189268280, office@wokinghamwatersidecentre.com.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To identify our customers.

To contact our customers regarding any bookings, invoices or registrations.

We may keep customers updated on events, offers and news via email if requested.

To create marketing content and materials, for example brochures, social media posts, newspaper articles and adverts, the company website.

To ensure the safety of customers and to make sure we have sufficient information should an accident/incident occur.

To take payments for services and goods.

To run our events, courses and other services.

To know the skill level of our customers.

To promote our company through marketing materials and social media.

To provide instructor courses / issue qualifications.

To issue certificates for National Governing Body awards.

To meet lawful requirements set out by HMRC and other governing bodies.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Personal Data:

- Title
- Name
- Date of Birth
- Gender
- Email Address
- Mobile Number
- Home Number
- Emergency contact name, number and home address
- Photo (if taken in connection with an award)
- Address
- Interests
- Credit / Debit Card Details
- Membership Numbers
- Instructor Qualification Details

Special categories of data:

- Medical Conditions and Allergies

We have obtained your personal data from online forms, phone, email or face to face communications. When collecting data for children this is taken from the parent, legal guardian or provided on their behalf by an organisation we are working with. For adults the data is either taken from the individual, family member, friend or colleague (when they are making a booking for someone else).

5. What is our legal basis for processing your personal data? Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

Consent of the data subject;	Photographs of people under 16 years old.
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Contract of course, tuition, hire, launch, event participation, café sale.
Processing necessary to protect the vital interests of a data subject or another person	Emergency Contact Details, medical conditions and allergies.
Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	Customer interests for marketing. Email consent to send newsletters offers or events information by email. Photos of adults for marketing purposes.

Special categories of personal data (article 9 of GDPR)

Our lawful basis for processing your special categories of data:

Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	Medical Conditions and allergies.
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6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with the parties set out below for the purposes outlined in section 3.

Paddle UK acting as National Governing Body based in the United Kingdom who accredit and monitor instructors and who accredit individuals on completion of water sport awards.

Wokingham Waterside Centre Staff based in the UK including permanent, temporary and freelance staff.

Elavon, payment processing company based in EU, who provide card payment processing.

Square, payment processing company based in UK, who provide card payment processing.

Google Ireland Ltd, based in EU, who provide email and data storage.

Should the need arise, we may contact the following:

Medical Practitioners, 999, 111 based in the UK who provide medical information, guidance and assistance.

Health and Safety Executive, Government Department based in the UK who require accident and incident reporting in certain circumstances.

Police, HMRC, based in the UK who are law enforcement officials.

Lawyers and Consultants who are professional advisors

Activities Industry Mutual, based in the UK who provide insurance services.

Pharos Response, based in the UK who provide professional crisis management support.

Eola, online booking system, based in the UK who provide booking management.

Sailia, online booking system, based in the UK who provide booking management.

Paddle UK Safeguarding Team, based in the UK who provide safeguarding support.

Council Social Care Services, based in the UK who provide safeguarding and child protection support.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. How long do we keep your personal data?

Wokingham Waterside Centre keep your personal data for no longer than reasonably necessary for a period of 3 years for adults and until the 21st birthday of children for insurance purposes against personal injury claims. Any personal data included in our financial accounts will be kept for 7 years from the end of our financial year.

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract with Wokingham Waterside Centre. Should you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example to provide you with outdoor activities). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

9. Website Third-party links outside of our control

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website we encourage you to read the privacy notice of every website you visit.

10. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We have established the following personal data control mechanisms:

Customers have to opt-in to receive any newsletters or emails containing events or offers.

Customers can opt-out of receiving these emails at any time.

Where supplied we record your interests so that the communications you receive are in line with your interests.

11. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.

12. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was our lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

No fee required – with some exceptions

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your requests in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents and contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to duty of confidentiality.

All computers and database systems are password protected. All computers are stored at our office address and so not accessible.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

14. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

15. Automated Decision Making

We do not use any form of automated decision making in our business.

16. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

17. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website. Please check frequently to see any updates or changes to our privacy policy.

Our compliance with the General Data Protection Regulation is reviewed annually.

18. Dealing with Security Incidents / Data Breaches

If a potential data breach is identified the data protection officer (DPO) should be notified immediately (this is Kathryn Hall). Secondly the scope and impact of this will be assessed including:

- Ascertaining that personal data was breached.
- Estimate the number of data subjects whose personal data was possibly breached.
- Determine the possible types of personal data that were breached.
- List security measures that were already in place to prevent the breach from happening.

Next the relevant parties will be notified: Including the data protection authority and data subjects. Actions to mitigate the impact of the breach will be taken. We will also take all possible measures to reduce the risk and contain further unauthorised access and continue to refine the original estimate of the number of data subjects breached and the types of personal data that were breached and notify the relevant authorities to investigate.

Once the personal data breach has been contained, we will conduct a review of existing measures in place, and explore the possible ways in which these measures can be strengthened to prevent a similar breach from reoccurring.

19. How to make a complaint / service access request

To exercise all relevant rights, queries or complaints please in the first instance contact Kathryn Hall at office@wokinghamwatersidecentre.com, 01189268280.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.