**Portsmouth North End Cycling Club**

**Privacy Notice**

**In accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679**

**Portsmouth North End Cycling Club** is committed to protecting and respecting your privacy. The PNECC (“the Club”) is the Data Controller of any personal data you provide for membership purposes and is responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way. We have not appointed a Data Protection Officer to oversee compliance with data protection laws as this is not required of us, but our Membership Secretary has overall responsibility for the protection of the personal data obtained from the Club’s membership and personal data can only be obtained via the holder of that post. Please email [membership@pnecc.co.uk](mailto:membership@pnecc.co.uk) in the event of any query or complaint in connection with the information we hold about you.

Suspected breaches of data security are to be reported in the first instance to the Club’s Membership Secretary. In the event of an unsatisfactory response, the matter can be escalated to the Club’s Trustees.

**What personal data we hold on you**

You may give us personal information by filling in forms at an event or online, or by corresponding with us by phone, e-mail or by some other method. This includes information you provide when you first register with the Club, your Club membership renewals, organised coaching sessions, time trials, road races or other events and activities organised in the Club’s name. The information you give us may include your name, date of birth, address, e-mail address, phone number, name of the British Cycling-affiliated or Cycling Time Trials-affiliated clubs with which you are registered and your gender. We may also ask for relevant health information e.g. illnesses that may affect your ability to compete or partake in coached sessions or events. In the case of children, a parental consent form is required for all persons under 18.

**Why we need your personal data**

The reason we need your data is to be able to administer your membership and provide the membership services you are signing up to when you first register with the Club. The lawful basis upon which we process your personal information is that we have a contractual obligation to you as a member to provide the services you are registering for.

Reasons we need to process your data include:

**For training and competition entry**

* Sharing personal data with Club coaches or officials to administer British Cycling coaching/training sessions, conforming to guidelines and the health and safety of the persons involved (e.g. ICE details, next of kin etc. during Club rides).
* Sharing personal data with British Cycling (e.g. Regional School of Racing, Talent Teams, Regional Training Sessions), Cycling Time Trials leagues, individual British Cycling events, other competition providers for entry in events, complying with insurance and National Governing Body guidelines.

**For reporting purposes**

* Sending an annual Club survey to improve your experience as a Club member e.g. (British Cycling Go-Ride Clubmark).

**For membership and club management**

* Processing membership forms and payments.
* Sharing data with Executive Committee members to provide information about Club activities, membership renewals or invitations to social events.
* The Club newsletter promoting Club activity.
* Publishing race and competition results.

Any **special category health data** we hold on you is only processed for the purposes of fitness/health checks or passing health data to Club coaches to facilitate the safe running of training/coaching sessions as above. We process this data on the basis of lawful consent. We will, therefore, also need your explicit consent to process this data, which we will ask for at the point of collecting it. A copy of this document will be made available when we ask for this information, and it will be available on the Club website and upon request.

On occasion we may collect personal data from **non-members** e.g. when a non-participant fills in a form at a taster event/time-trial/race/coaching session. This information will be stored as appropriate and as illustrated below. As the basis for collecting and processing data is lawful consent, we will, therefore, also need explicit consent from non-members to process this data which we will ask for at the point of collecting it. A copy of this document will be made available when we ask for this information, and it will be available on the Club website and upon request.

**Coaching Sessions**

A British Cycling signing-on form will be used to record persons attending with name, email and contact details. Hard copies are retained in the coaching file securely for up to 6 months, and then destroyed. If an incident (or near miss) occurs, the details are recorded on a hard copy Incident Form and the details are then emailed to British Cycling. The hard copy of the Incident Form is retained by the club in the coaching file until acknowledged, in the case of a near miss, or for longer if there is any possibility of an insurance claim. British Cycling or the insurance provider advises the Club as appropriate.

**Time Trials**

A Cycling Time Trials signing-on form is used to record competitors with name, email and contact details. Hard copies are retained securely by the Club and at the end of the racing season all hard copies are destroyed. In the case of an incident a report is sent to CTT and they or the insurance provider advises the Club as appropriate.

**Road Race**

Entries (online and hard copy) along with signing-on forms, incident forms etc. will be retained securely by the Club for up to 3 months after the event and then destroyed, unless an incident has occurred, in which case British Cycling or the insurance provider advises the Club as appropriate.

**Club Rides**

Ride leaders will request emergency contact details from riders participating, including Club members and guest riders. This data is required for the safety of participants during the ride and retained only for the duration of the ride. Ride Leaders will delete any records taken, once the ride has finished.

**Social Media**

The Club has the following social media pages: Facebook, Twitter, Instagram, Strava and Flikr. All Club members are free to join these pages. If you join any of the social media pages please note that the providers of these platforms have their own privacy policies and the Club does not accept any responsibility or liability with regard to how the providers use the data they collect about you. Therefore you are encouraged to check these policies before you submit any personal data on the Club social media pages.

**Who we share your personal data with**

The Club does not supply any personal data it holds for this purpose to any third party other than those detailed in this policy. There are areas where your information is stored electronically - securely online within the Club website cpanel and on the Club Membership Secretary’s IT appliance. Executive Committee members have the ability to inform members via email of: events, training/coaching sessions, club kit availability and of other necessary notices and meetings. The ‘block email system’ used is configured so as to prevent other recipients from viewing other recipients’ private email addresses. Club members have password protected access to their membership area and can update their personal information. Hard copy information is retained within the Club’s Coaching File (such as consent forms and signing-on information) and this file is held by the Coaches delivering the sessions in order that they may use it to contact persons in the event of an emergency. This information is stored securely when not in use.

**How long we hold your personal data**

We will hold your personal data on file for as long as you are a member with us. Any personal data we hold on you will be securely destroyed after three years of inactivity on that member’s account (in line with British Cycling data retention policy). Your data is not processed for any further purposes other than those detailed in this policy.

**Your rights regarding your personal data**

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data, to restrict or object to certain kinds of processing of your personal data, including direct marketing, to the portability of your personal data and to complain to the UK’s data protection supervisory authority (the Information Commissioner’s Office) about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership or allow you to participate in events with us. This is in accordance with the need for us to safeguard the wellbeing of all other Club members, guests and other participants in events promoted by the Club, as laid down in the Club’s Rules, Constitution and Club Rides Code of Practice.

By order of the PNECC Executive Committee

25th May 2018