



PADDLE
CYMRU

Privacy Policy Members & Participants

www.paddlecymru.org.uk

Privacy Policy – Members & Participants

Last review:	August 2023
Next review:	August 2026

Paddle Cymru is a “controller” of the personal information that you provide to us online, over the phone and through paper forms. Paddle Cymru uses an online system called JustGo provided by Azolve Ltd in order to process membership, event entries and maintain records of qualifications and training courses. Members can access their personal information stored in JustGo through the Member Login button on the Paddle Cymru website.

We also hold some records of qualifications and training courses in a legacy database stored securely offline. We are currently in the process of migrating this data onto JustGo.

What data we hold

Member personal data

When you register as a member of Paddle Cymru or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- Contact details – name, address, email address (for children under 16 we will also require the email address of a parent or legal guardian)
- Date of birth
- Membership category
- Payment details – e.g. bank account number, sort code, card details if paying by direct debit or payment card
- Details of any clubs you may be a member of
- Roles you may hold within a club
- Training or qualifications you hold relevant to paddlesport
- Equality information – disability (if any), ethnic group, religious belief, gender identity, sexual orientation

You can also choose to share additional information with us by filling out your paddling or coaching profile and/or uploading a photograph.

Participant/Athlete personal data

When you enter an event organised by Paddle Cymru, or organised by a third party (such as a course provider) and processed by Paddle Cymru, or if you join the Paddle Cymru Performance Programme, we will ask you for the following personal information:

- Contact details – name, address, email address (for children under 16 we will also require the email address of a parent or legal guardian)
- Date of birth
- Details of the course being undertaken (if applicable) and the training/qualification to be certificated
- If booking directly, payment or card details
- Equality information – disability (if any), ethnic group, religious belief, gender identity, sexual orientation
- Emergency contact details

If you complete any surveys we send to you or post on our website, we may also collect your personal opinions about the services we offer. If you apply for a job we will collect information about your previous employment. If you become the subject of a safeguarding investigation, we may hold information about the investigation or any prior convictions which are disclosed to us as part of a DBS check.

Why we need your personal information – contractual purposes

Member personal data

We need to collect your personal information so that we can manage your membership. We will use your personal information to:

- Set up your online membership account;
- Provide you with core member services via post and email, including membership renewal information and your membership pack/card, coaching and training information and opportunities, our member magazine Ceufad, any other magazines you may subscribe to through your membership, information about General Meetings, etc;
- To provide you with details of forthcoming activities, events and competitions, as well as those of selected third parties such as our partner organisations and affiliated clubs;
- To support clubs to manage their membership information;
- To support clubs in the deployment of coaches by allowing them to access details of your training and qualifications.

If you do not share your personal data with us, then we may not be able to provide you with all the membership benefits and services included in your membership.

If you give us permission to do so, we will also use information about any provider status you hold or clubs that you manage to publicise the services you offer on our website or on the Paddle UK Go Paddling website.

Participant/Athlete personal data

We need to collect your personal information so that we can manage events and courses in which you participate and maintain records of any qualifications or awards that you gain through your participation. We will use your personal information to:

- Administer the event;
- Set up your online account (if you are not already a Paddle Cymru member);
- Process event results;
- Where applicable, send you confirmation of completion and or certification;
- Send you reminders to keep any qualification you hold up to date.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to provide the above services.

Why we need your personal information – legitimate purposes

Member personal data

We also process member personal information in pursuit of our legitimate interests to:

- Promote and encourage participation in paddlesport by sending communications to individuals and members and booking information for upcoming competitions, courses and other events. Our competitions and events may be filmed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, educational and development purposes;
- Provide events by accepting and managing entries and checking your personal information to ensure you are entered into the correct category;
- Review, develop and improve the services and activities we offer;
- Research, develop and manage new and existing programmes and projects and to promote paddlesport;
- Monitor and develop participation in paddlesport by monitoring member engagement through inviting our members to participate in surveys for research and development purposes;
- Invite members to nominate individuals for awards and shortlisting/selecting winners;
- Comply with reporting requirements from regulatory bodies, government offices and our funders, including Sport Wales;
- Respond to and communicate with members regarding your questions, comments, support needs, complaints, concerns or allegations;
- Retain historical information for archival purposes, such as event results.
- Carry out statistical analysis.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your information for the above purposes. If you wish to object to any of the above processes, please contact us on admin@paddlecymru.org.uk or 01678 521 199. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for your benefit as a member.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information for the purposes of complying with our obligations to:

- Maintain a register of our members in accordance with the Companies Act, which includes each member's name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
- Monitor our compliance with the Equality Act and the Equality Standard for Sport, to promote equality of opportunity within paddlesport and to make reasonable adjustments where necessary – where appropriate, we will also seek your consent to collect and store any sensitive personal data for this purpose.
- Report on the size, achievements and profile of our members (in anonymised form) to Sport Wales;

- Process DBS checks (or support our affiliated clubs to process these checks) and to verify checks to ensure compliance with Safeguarding legislation and our Safeguarding Policies and Procedures;

Where you hold a role which involves regulated activity with children, we (or a representative from one of our affiliated clubs) will collect personal data from you to conduct a DBS check, in accordance with our Safeguarding Policies and Procedures. We use an online system managed by the Welsh Sports Association (trading as Vibrant Nation) to process these checks and store your personal information.

This means that we may collect information about any criminal convictions or alleged commission of criminal offences. If we need to do any further investigation, either in response to your DBS check or if we receive a safeguarding concern about you, we will collect information about our investigation which will be stored securely in an online, password protected database through the cloud service Airtable and on Microsoft OneDrive. This service may transfer your data out of the European Union, but it is stored in compliance with all relevant data protection legislation. We have a legal obligation to collect and store this information to allow us to consider whether or not you can volunteer in a regulated role with children and/or adults at risk.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Club member personal data: We collect and store personal information about members of affiliated clubs. Where we do this, the clubs have a responsibility as “controllers” to provide their members with privacy notices and we will not use such personal information for any other purpose.

Who we share your personal information with

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Sport Wales, Paddle UK, Paddle Scotland, Paddle Northern Ireland, and the Outdoor Partnership for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Disclosure and Barring Service (DBS), the police or social services for the purposes of safeguarding children. Where a safeguarding concern relates to members of Paddle UK, we may also share information with Paddle UK about the case to allow for a coordinated approach to safeguarding.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

Paddle Cymru employs third party suppliers to provide services, including IT and the mailing of magazines. These suppliers may process personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and to protect it.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

If you hold a provider status or manage a club or centre, with your express permission we may share your contact details with Paddle UK for the purpose of promoting your services or the services of your club or centre through their website or the Go Paddling website. This sharing may take place automatically through a direct link between our membership databases.

Member personal data

Paddle Cymru employs Azolve to administer our membership, qualification and events database and club management system, as part of which Azolve contracts third party payment providers to process your payments on our behalf. Azolve and its payment providers process member personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and to protect it. If you are a member of an affiliated club, we will also share your personal information with the club for the purposes set out above. This will include your name, address, date of birth, contact information and any qualifications or credentials you may hold.

Our members receive insurance provided via Towergate Insurance, as part of a policy arranged through Paddle UK. Where an insurance claim is made or notification of a possible claim received, we will pass personal data relating to the potential/actual claim to Towergate for the purpose of administering the claim.

Where you have opted to receive a magazine subscription from a third party through Paddle Cymru (for example, Kayak Session), we will pass your personal information to the publisher so that they can administer and manage your magazine subscription.

Our quarterly magazine, Ceufad, is sent out by a third party contractor, the Right Sort Mailing Company. The name and address of magazine recipients are transferred to this contractor each time the magazine is mailed out.

Participant/Athlete personal data

If you are a coach, or complete any coach education course, we will share your personal information (name, address, date of birth, gender, email address and qualification details) with Paddle UK in order to process your qualification certification. This information could be shared with regulatory bodies and government offices for insight and compliance. If you move to or from Wales and England, Scotland or Northern Ireland, we will share your details (including qualifications) with the relevant UK canoeing membership association.

We may publish the results of competitions on our website. This could include competitor name, age/age category, and result. We may also be required to share personal information relating to competitor health in order to undertake activities to eliminate doping, at a sporting event, within our sport generally, or to provide information about doping, or suspected doping, to UK Anti-Doping or another body with responsibility for eliminating doping in our sport.

If you enter an event organised by Paddle UK, the Paddle Scotland or Paddle Northern Ireland, Paddle Cymru may, on request by the relevant organisation, provide confirmation

of your membership category and expiry date in order to allow your event entry to proceed. This confirmation may be done manually (by staff checking your account details) or through an automated link between our membership databases.

If you represent Paddle Cymru or Paddle UK internationally, and if entries to such competitions are processed by Paddle Cymru or Paddle UK, then the necessary personal data in order to complete the event entry will be provided to the officials organising the event.

How we protect your personal information

We store your data securely on systems that meet all current data protection standards. This includes Microsoft OneDrive, Mailchimp, Airtable and our JustGo database provided by Azolve. We also currently have a legacy database which is stored securely offline. Your personal information is stored primarily on servers based in the UK and Europe (JustGo), and is accessed by our staff and volunteers for the purposes set out above. We will occasionally store some types of member data on Airtable or on OneDrive and as these are US-based companies your data may be transferred out of the EU but will at all times be stored in compliance with the GDPR.

If you are in our performance programme, we are required to transfer your personal information out of the EU for the purposes of entering you into competitions and booking travel. Where your personal information is transferred out of the EU, we can provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

How long we keep your personal information

We only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for 7 years. We may keep certain personal information for longer in order to confirm your identity, when you were a member of Paddle Cymru and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members and in the event of a claim against you or Paddle Cymru. In certain circumstances, e.g. regarding safeguarding, we may keep information for longer periods of time. We also will maintain records of any qualifications or credentials you hold indefinitely unless you ask us to delete your records.

Your rights

You can exercise any of the following rights by emailing us at admin@paddlecymru.org.uk

Your rights in relation to your personal information are:

- You have a right to request access to the personal information that we hold about you by making a “subject access request”;
- If you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- You have a right to request that we restrict the processing of your personal information for specific purposes; and
- If you wish us to delete your personal information, you may request that we do so. Any requests received by Paddle Cymru will be considered under applicable data

protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

Further information

If you need any further information, please contact us at admin@paddlecymru.org.uk

Consent for Communications

Why we need your personal information

Where you are happy for us to do so, we would like to contact you by email with information about events and information related to Paddle Cymru and paddlesport in Wales.

If you would like to receive email communications from us please tick the box either when you sign up for membership online or when you access your individual JustGo account online via the Paddle Cymru website.

At any time you can request that we stop sending emails to you by changing your email preferences in JustGo. Alternatively, you can email us at admin@paddlecymru.org.uk and we will change your communication preferences.