



1 General Information

We are committed to protecting the privacy and security of your personal information.

Under data protection law, we are a “data controller”. This means that we hold personal information about you, and are responsible for deciding how we store and use that personal information.

As a data controller, we are legally required to provide certain information to individuals whose personal information we collect, obtain, store and use. That information is contained in this document (our “privacy notice”).

It is important that you read this document (together with any other privacy notices we may provide to you on specific occasions), so that you are aware of how and why we are using your personal information and the rights you have in relation to your personal information.

This Privacy Policy applies to all members and prospective members of the Swansea University Windsurfing Club (‘SUWC’), and all people who attend events or engage in activities with the SUWC.

An event or session refers to a participation in a SUWC managed activity, which could be a windsurfing session, a windsurfing event at another university, a social event, or anything else that we publish on, and grant access through the website.

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

2 What Personal Information do we hold about you?

As a client or prospective member you will provide us with certain personal information relating to you at the outset of our engagement with you. This will be confirmed and further information may be supplied when you sign-up to an activity. We will hold a record of what sessions you have attended. We will update your record with the status of your membership from the Swansea Union site.

Data protection law protects personal information which is essentially any information from which an individual can be identified. There is a type of personal information which receives additional protection because of its sensitive or private nature, this is sometimes referred to as ‘special category personal information’ and means personal information about an individual’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-



membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual's health, sex life or sexual orientation. We will never collect any 'special category personal information' about you; although such information could occasionally be inferred – for example, if you were attending a political party conference at the University, then the information that we hold about you (your name and the fact of your attendance at the conference) could be used to infer your political opinions.

The information we will collect from members who engage in our activities who engage with us will include:

- Your Name
- Your Email address
- Your Student Number

We also collect the following data automatically when you access our website.

- IP addresses
- User Addresses

The information that we will collect from the Swansea Union site, will include:

- Your Windsurfing membership status

3 What will we use your personal information for and what are our legal bases for doing so?

We use the personal information we hold about you for a number of different purposes, which we list below. Under data protection law we need to have a valid legal basis for using your personal information, we also set out below the legal bases which we will be relying upon.

3.1 We use the personal information we hold about you for the following reasons:

- To contact you about an upcoming windsurfing session you've signed up to

In these cases, the legal basis that we will be relying upon to process your personal information will be because it is necessary for the performance of the contract between us.

3.2 We will also use the personal information we hold about you, if it relates to your role at a company or organisation, for the following reasons:

- To record the attendance of members at sessions
- To check if you have Windsurfing membership on the Swansea Union site.

In each of these cases the legal basis that we will be relying upon to process your personal information will be because it is in our legitimate interests. Our specific legitimate interests are:

- to operate a sustainable business model



- to enhance our reputation through the provision of an exceptional customer experience

3.3 We will also use the personal information we hold about you, if you have provided specific consent and if it does not relate to data processed under 3.2, for the following reasons:

- None currently

In this case the legal basis that we will be relying upon to process your personal information will be because you have provided your consent for us to use your personal information in this way.

3.4 We will also use the personal information we hold about you for the following reasons:

- To comply with and demonstrate compliance with immigration law

In these cases the legal basis that we will be relying upon to process your personal information will be because it is required for the compliance with a legal obligation.

4 What Special Category Personal Information do we hold about you?

We do not hold any Special Category Personal Information about you.

5 Further general information about using your personal information

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Some of the personal data we request will be because we have a legal or contractual requirement to obtain and use the information or it is necessary for us to obtain the information to be able to enter into a contract with you.

We do not carry out any automated decision-making or profiling in relation to you.

6 Who do we share your information with?

Your personal data will be held by Swansea University Windsurfing Club through the means of a Google Firebase Database. Your personal data will be shared internally with other individuals where this is reasonably necessary for the processing purposes set out in section 3 above. For example, it will be necessary to share some of your personal information with the members of the committee so they're able to arrange transportation.



Google Firebase is a Data Processor as the information is stored on a database with them. You can find their privacy policies here: <https://cloud.google.com/terms/> and here: <https://firebase.google.com/terms/data-processing-terms> . We use a Realtime Database with Firebase to store your data, and Firebase Authentication to allow users to create accounts and login.

From time to time we will need to share your information with external people and organisations. We will only do so where we have a legitimate or legal basis for doing so and in compliance with our obligations under data protection laws.

Your information may be disclosed to:

- **UPP Ltd** in connection with the provision of residential accommodation at the Bay Campus
- **Third party providers** of event related products (including but not limited to caterers, accommodation providers, transport operators, display and audio-visual providers, entertainers and content providers) if in our reasonable opinion this is necessary for the successful performance of our contract with you
- **The Police, local authorities, the courts** and any other government authority if they ask us to do so (but only if us doing so is lawful).
- **Where we are legally obliged to do so**, e.g. to comply with a court order

8 International Transfer of Your Information

The majority of your personal data is held within the United states of America; where this is the case, the organisations are party to the EU-US Privacy Shield Framework and held within a GDPR compliant environment.

9 How Long Do We Keep Your Information For?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place. Our specific retention schedules are as follows:

- Following the creation of an account, we will hold it until the end of the next academic year where you don't purchase Windsurfing membership

The reasons for our retention of your personal data for these periods are because, in our experience, these are the lengths of time following an engagement in which either a client or supplier may return to us with a reasonable expectation that we will have maintained the required data in order to progress their enquiry or to answer a reasonable query about their event.

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.

10 Individual rights



Data protection legislation provides individuals with a number of different rights in relation to their data. These are listed below and apply in certain circumstances:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request data portability** of your personal information. In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal information either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact:

James Nahajski
Windsurfing Club
Faraday Tower,
Singleton Park,
Swansea,
SA28PP
Email: windsurfing@swansea-sports.co.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11 Ability to withdraw consent

Where your personal data is processed on the basis of your consent or explicit consent, you have the right to withdraw your consent to the processing at any time. You can do this by emailing Kate Hannington. Any withdrawal of consent will not affect the lawfulness of any processing of your personal data based on consent before the withdrawal is notified.

12 Accuracy

If any of your personal details change during your employment/engagement you should James Nahajski to notify them and provide them with the updated accurate information.

13 Updates to this privacy policy

We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

We will keep this policy under regular review to ensure it is accurate and kept up to date. This policy was last updated on August 13th 2020.

14 About Us

Swansea University Windsurfing Club is a not for profit sports club that is a part of the Swansea Sports group of clubs within Swansea University.

Swansea University is an institution established by Royal Charter of Singleton Park, Swansea, SA2 8PP

Swansea University Windsurfing Club is the data controller of the information you provide us with. The term “data controller” is a legal phrase used to describe the person or entity that controls the way information is used and processed.

15 Where to Go if You Want More Information About Your Rights or to make a Complaint

The Information Commissioner’s Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here http://www.ico.gov.uk/for_the_public.aspx.

Swansea University Windsurfing Club

Privacy Policy



You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

16 Contact us

You're welcome to get in touch with us to discuss your information at any time.

James Nahajski
Windsurfing Club
Faraday Tower,
Singleton Park,
Swansea,
SA28PP
Email: windsurfing@swansea-sports.co.uk