

## Wave Walkers Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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### Contact details

Telephone: 07903 029473

Email: [wavewalkersteam@gmail.com](mailto:wavewalkersteam@gmail.com)

### What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Date of birth
- Gender
- Addresses
- Emergency contact details
- Photographs or video recordings
- Online meeting recordings for the purposes of minute taking
- Service use history e.g. attendance at training sessions and events
- Records of meetings and decisions e.g. team and committee meetings
- Payment details (including card or bank information for transfers, standing orders and transactions)
- Website user information (including user journeys and cookie tracking)

We also collect or use the following special category information to **provide services and goods, including delivery and third party referrals**. This information is subject to additional protection due to its sensitive nature:

- Health and fitness information

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Website and app user journey information

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Information about an individual's swimming competency

We also collect or use the following special category information to **comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Health information

## Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)

- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - We are collecting or using the information because it benefits you as communication is a vital part of running the team and keeping you informed of any updates to how the team is operating
  - We are collecting health information (special category data) so we can provide accessible and safe facilities and training suitable for your needs

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - We collect personal information from people interested in our sport who get in touch with us via our web form, email, social media, or who may sign up to events via companies such as Eventbrite. We use this information to keep in touch with those who are interested in attending our sessions. This benefits the individual in deciding if they want to join the team and our organisation in gaining new members.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - To comply with reporting of Health and Safety issues in cases of accidents or incidents leading to insurance claims

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

### Where we get personal information from

- Directly from you. You may give us your personal information, by filling in forms or by corresponding with us by post, phone or email. This includes personal information you provide when you:
  - Complete a contact form on our website
  - Complete a membership application form and we process the membership fee
  - Agree to be added to our WhatsApp community, associated WhatsApp groups, and the Spond app
  - Express an interest in any events, training or membership
  - Purchase any products from us e.g. a team T shirt and we process payment
  - Share information with us about your health and fitness
- Publicly available sources, for example from social media

### How long we keep information

We will only store your data for as long as is reasonably necessary and for the purposes we collected it, including any legal, regulatory, tax accounting or reporting requirements. We may store your personal data for longer if we receive a complaint or if we believe there may be any legal action regarding our relationship with you.

How long we store your personal data will depend on the nature and sensitivity of the information. We will also consider the purposes for which we process your personal information and any other relevant legal, regulatory, tax, accounting or obligations, and whether we can achieve those purposes through other methods.

We may also anonymise your personal information so it can no longer be connected to you. This is to help us improve our service and marketing strategies.

### Who we share information with

- Organisations we're legally obliged to share personal information with
- Professional advisers including banks, accountants, and insurers based in the UK who may provide banking, insurance and accounting services
- HM Revenue and Customs, regulators and other authorities who may require reporting of processing activities
- Suppliers and service providers - for example if we need to register you in a dragon boat racing event e.g. the Cookham Regatta
- We may share your personal information with the British Dragon Boat Racing Association (BDA) whether you choose to become a BDA member or not. This is to provide insurance for our club activities and to allow them to properly administer the sport. If we share your information the BDA will provide you with access to the digital platform to administer your details. The BDA will invite you to sign into and update your details. The platform will allow you to set and amend your privacy settings. You can also request your information is deleted should you wish to leave the club.
- If you participate in the Vogalonga in Venice Italy we will share your personal information as part of the registration process. The rules of the event explain that the act of registration, grants participants consent under art. 23 Legislative Decree no. 196/03 and EU Regulation 2016/679 "GDPR" to the use by the (Vogalonga) Organizing Committee of your personal data.

### How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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