

London Clarion Cycle Club

Privacy Notice

www.londonclarion.org.uk

This notice applies to the processing of personal information in relation to membership and other activities associated with the London Clarion Cycle Club (London Clarion).

There are various additional provisions within it relevant only to those members who pay an additional subscription to be an affiliate member of the London section of the National Clarion Cycling Club (National Clarion). Such members should also be aware that the National Clarion have their own Privacy Policy which should be read in conjunction with this policy (where it applies) and can be accessed at: <https://clarioncc.org/wp-content/uploads/2019/10/Clarion-CC-Privacy-Notice-May-2018.pdf>

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Club Secretary has overall responsibility for data protection compliance. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice explains how we comply with the law on data protection and what your rights are.

For the purposes of data protection, we will be the Controller of any of your personal information that we collect.

1. PERSONAL INFORMATION WE COLLECT

We may collect the following types of personal information about you:

- **Contact details:** information that allows us to identify and contact you directly such as your name, email address, telephone numbers and postal address.
- **Personal information:** such as date of birth and gender
- **Details of the correspondence (including e-mail correspondence) you send and receive from us and details of any claims, disputes or complaints:** this includes letters and emails, SMS, MMS and other electronic communication.
- **Emergency Contact Information:** The name and telephone number of your emergency contact.
- **Whether the Clarion will be your first claim Club:** we ask for a Yes/No answer as to whether the Clarion will be your first claim Club and, if not, who your first claim Club is.
- **Photographic or Video Images:** we may collect still or video images of you in the course of events or other activities organised by us.
- **Times, placings, distances or other results arising from your participation in events or activities organised by us:** if you take part in a competition or other event organised by us we may collect and use information relating to your performance and results in those events.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We do not collect, store or use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs or sexual orientation
- information about your health, including any medical condition, health and sickness records, medical records and health professional information
- biometric information about you, for example fingerprints, retina scans.

We will also not collect, store and use any criminal records information in relation to you.

3. SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM

We will only collect personal information in the following way:

- **Directly from you:** when you register as a member of the London Clarion, when you indicate that you may wish to attend an event, complete forms we provide to you, respond to a survey, use our website, make a complaint or communicate with us directly in some other way.
- **From the National Clarion:** in membership records provided by them.
- **From a third party or other members:** We may collect photographic or video images of you taken by other members or third parties. We may collect results and performance information from third parties or other members.

4. WHAT WE USE YOUR PERSONAL INFORMATION FOR

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. Which will apply will depend upon the nature of your relationship and interactions with us. The definitions of these Lawful Basis can be found on the ICO website. <https://ico.org.uk>

Purpose	Personal information used	Lawful basis
To manage and support the membership contract between ourselves and individual members.	All the personal information we collect	Contract. The terms of the membership arrangements constitute a contract between us and our members.
Deal with your queries or complaints, claims, legal disputes or raise queries, claims, legal disputes or complaints with you	All the personal information we collect	Legitimate Interests. It is in our interests to ensure that any complaints, claims, or legal disputes are dealt with quickly and fairly.

Maintain and improve our services and/or products	All the personal information we collect	Legitimate Interests It is in our interests to maintain and improve the operation of the Club.
To provide you with requested information	All the personal information we collect	Legal Obligation We have a legal obligation to provide you with copies of the information we hold about you when you request it.
For the purposes of promoting the sport, the Club, our events and membership.	Images in video and/or photographic form.	Consent. Where we wish to make use of video or photographic material we will always seek the consent of members before doing so.
Holding any events	Your contact details, details of attendance, your comments in response to any surveys or forms and dietary requirements	Legitimate Interest. We have a legitimate interest in holding events and tracking attendance and providing appropriate food and drinks at events. We may also have a legal obligation to comply with health and safety requirements
To comply with our legal obligations	All the personal information we collect	Legal Obligation To comply with any legal or regulatory obligations or requirements
To manage our relationship with you and to operate our organisation	All the personal information we collect	Legitimate Interest. We have a legitimate interest to operate our organisation in an efficient way and to promote and expand it.
Storage of records relating to you and also records relating to our organisation	All the personal information we collect	Legal Obligation We have a Legal Obligation to retain financial records and other information relating to your membership.

For some of your personal information there may be a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to properly manage your membership/s or comply with our legal obligations and we may have to terminate our relationship.

For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly manage your membership/s.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the “**Contacting us**” section below.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use this anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our website and developing new products and services.

5. HOW WE STORE YOUR MEMBERSHIP INFORMATION

Members of London Clarion

All London Clarion membership information is stored on Membership Mojo -
<https://membermojo.co.uk/london-clarion>

Though the information of members whose membership has expired may be transferred to another database.

Members of London Clarion who pay an additional subscription to be an affiliate member of the London section of the National Clarion

The name, address, date of birth, e-mail address and membership number are manually copied to a second Membership Mojo account -

<https://membermojo.co.uk/londonclarionccaffiliatedmembers>

Note that this address differs from the standard form that is quoted in the National Clarion's Privacy Notice.

Although these members can also access their information on this system, we ask them not to do so in order to ensure consistency between the two databases.

Note that the information of members whose membership has expired may be transferred to another database.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share personal information with the following:

Members of London Clarion (i.e. all members)

Any London Clarion official

Also, service providers and advisors*: such as companies that support our IT (e.g. the online membership system), organise events for us, process payments, send communications to our members (e.g. email communications and your membership card), provide us with legal, or financial advice and generally help us fulfil our obligations as a membership club.

*These may have their own Privacy Policies

Members of London Clarion who pay an additional subscription to be an affiliate member of the London section of the National Clarion (only)

Any London Clarion official and any National Clarion official who requests access to it

Also, service providers and advisors to the National Clarion*: such as companies that support their IT (e.g. the online membership system), organise events for them, process payments, send communications to their members (e.g. the club magazine and their membership card), provide them with legal, or financial advice and generally help them fulfil their obligations as a membership club.

*These may have their own Privacy Policies

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

7. DIRECT MARKETING

We do not use your information for marketing purposes.

8. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect about you is not knowingly transferred to or stored in countries outside of the UK or European Union.

9. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

We will keep your personal information for as long as is necessary for the purpose for which it has been obtained and then for as long as there is any risk of a potential claim, which will be dependent upon the limitation period for the particular type of claim. We have set out below the main retention periods which will apply:

- For individual members this will be for as long as we continue to have a relationship with that member and then for a period of 6 years afterwards.
- For website users it will generally be a period of 6 years after you used our website.
- For individuals seeking information, making complaints or otherwise corresponding with us it will generally be 6 years.
- For individuals attending an event it will generally be a period of 6 years after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can update this information yourself using our online membership system (see point 5. above) or you may contact us by using the details set out in the “**Contacting us**” section below.

10. SECURITY

We take reasonable steps to ensure that the providers of our web-based services have appropriate security measures in place to protect your information. However, due to the constantly changing nature of security threats and vulnerabilities we cannot guarantee that these measures will provide

absolute certainty regarding the security of your information. We do, however, take data security very seriously and use all reasonable endeavours to protect the personal information we collect about you.

11. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the following rights in relation to your personal information. We support these rights in the following ways:

1. *The right to be informed about how your personal information is being used; Contained within this privacy policy.*
2. *The right to access the personal information we hold about you;*

By registering on our online membership systems (see point 5. above) you will be able to view all information we hold about you with the exception of video or photographic images. You will be contacted to ask for your consent before these may be used.

3. *The right to request the correction of inaccurate personal information we hold about you;*

By registering on our online membership systems (see point 5. above) you will be able to change or correct the information we hold about you.

4. *The right to request the erasure of your personal information in certain circumstances AKA "The right to be forgotten";*

Please contact us by using the details set out in the "**Contacting us**" section below.

5. *The right to restrict processing of your personal information where certain requirements are met;*

Please contact us by using the details set out in the "**Contacting us**" section below.

6. *The right to object to the processing of your personal information;*

Please contact us by using the details set out in the "**Contacting us**" section below.

7. *The right to request that we transfer elements of your data either to you or another service provider;*

Please contact us by using the details set out in the "**Contacting us**" section below.

8. *The right to object to certain automated decision-making processes using your personal information.*

Please contact us by using the details set out in the "**Contacting us**" section below.

You should note that the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they are subject to specific requirements and exemptions and we may not use your information in a relevant way. For example, we do not use automated decision making in relation to your personal data.

This privacy notice sets out a general summary of your legal rights in respect of personal information.

More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

12. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. If we do change this notice, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

13. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please Email: londonclarion@gmail.com or write to us at: London Clarion Cycle Club, 24 Brunel Road, London, SE16 6HZ

22nd May 2020

