



HWR DATA PROTECTION POLICY

Context and Overview:

Key Details

- Policy prepared by Phillip Plato (Director HWR Venue Facilities)
- Approved by Executive Committee/Board on – 22 March 2018.
- Policy to become operational on: - 25 May 2018
- Next review date: - *September 2019 (after AGM)*

Introduction:

Henley Women's Regatta (HWR) Ltd needs to gather and use certain information about individuals.

These individuals can include competitors/coaches as well as information relating to suppliers, contractors, volunteers, officials and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the Company's Data Protection standards and to comply with the law.

Why this policy exists:

This data protection policy ensures that Henley Women's Regatta (HWR) Ltd

- Complies with data protection law and follows good practice.
- Protects the rights of volunteers, athletes and partners.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risk of a data breach.

Data Protection Law:

The Data Protection Act 1998 describes how all organisations including Henley Women's Regatta (HWR) Ltd must collect, handle and store personal information. The requirements of the Act are supplemented by the GDPR coming into effect on 25th May 2018.

These rules must apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must be:

1. Processed fairly and lawfully.
2. Obtained only for specific lawful purposes.
3. Be accurate, relevant and not excessive.
4. Be accurate and kept up to date.
5. Not be held for any longer than necessary.
6. Processed in accordance with the rights of data subjects.
7. Be protected in appropriate ways.
8. Not be transferred outside the European Union unless that country or territory also ensures an adequate level of data protection.

People, Risks and Responsibilities:

Policy scope :

This policy applies to

- The Executive Board of Henley Women's Regatta (HWR) Ltd.
- The wider Organising Committee of Henley Women's Regatta (HWR) Ltd.
- All staff and volunteers of Henley Women's Regatta (HWR) Ltd.
- All contractors, suppliers and other people working on behalf of Henley Women's Regatta (HWR) Ltd.

It applies to all personal data that the company holds relating to identifiable individual people even if that information technically falls outside the Data Protection Act.

This data can include:

- Names of individuals.
- Postal address.
- Email address.
- Telephone number.
- A photograph of the individual.
- Bank or credit card details.
- Medical information.
- Plus any other information relating to an identifiable individual.

Data Protection Risks:

This policy opts to protect Henley Women's Regatta (HWR) Ltd from real data security risks including:

- Breaches of confidentiality – for instance information being given out inappropriately.
- Failing to offer choice – for instance all individuals should be free to choose how the company uses data relating to them.
- Reputational damage – the company could suffer if hacker successfully gained access to sensitive data.

Responsibilities:

Everyone who works for or with Henley Women's Regatta (HWR) Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

In addition each sub group or area of operation within HWR that handles personal data must ensure that it is handled and processed in line with this policy and that data protection principles are applied.

The following people have key areas of responsibility:

- The Board of Directors/Executive Committee is ultimately responsible for ensuring that HWR meets its legal obligations.
- Due to the nature of the organisation and its size there is no individual named specifically as a Data Protection Officer.
- Although key individuals in HWR will "process" data controlled by HWR, each individual head of respective sub groups within HWR (i.e. competition, friends, vitrix) is responsible for keeping the Executive Committee/Board updated about data protection responsibilities, risks and issues and reviewing data protection procedures in their area of operation and to ensure that people they are working with are aware of this policy and given appropriate training or instruction.
- Liaison will be required with those key individuals processing data for HWR to ensure that any computer services and equipment used for storing data meet acceptable security standards and that regular checks are performed to ensure software is functioning correctly

General Staff Guidelines:

- The only people able to access data covered by this policy should be those who need it for their work. Nobody in HWR should retain personal data on any unencrypted device or open platform service or share it with others outside of on a system approved by HWR (ie Office 365).
- Data should not be shared informally and should only be retained by HWR Data Processors who must be approved & authorised by the Executive Board.
- Notwithstanding the above, all volunteers within HWR should be required to keep any personal data secure by taking sensible precautions and following these guidelines:
 - Data should only be stored on the HWR system operated by approved Data Processors.
 - Conversely personal data should not be transmitted in an unencrypted or insecure format including via email (even if using the HWR domain) to other members of the organisation.
- Anyone within HWR who have any concerns about the procedures for storage, or use of personal data or who suspect that data might have been compromised, must immediately alert the HWR Data Processors and a member of the Executive Board.

Data Storage:

These rules describe how and where data should be safely stored.

- When data is stored on paper it should be kept in a secure / locked place where unauthorised people cannot see it or access it.
- Paper printouts should not be left where unauthorised people could see them such as on a printer or in open view on a desk.
- Data printouts should be shredded and disposed of securely when no longer required.
- When data is secured electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. HWR subscribes to Microsoft Office 365 which incorporates appropriate security and which is automatically backed up on the cloud..
- If any data is temporarily stored on removable media (such as CD or DVD) for effective operation of the regatta, these should be kept locked away securely when not being used and should be wiped deleted or destroyed when no longer required.

Data Use:

- No data relating to an identifiable individual should be used by any member of HWR for any purposes other than that directly related to the operation of the Regatta or its related activities. For example it would be inappropriate to use an email address to contact someone for personal reasons unrelated to the event.
- Personal data should not be shared informally. In particular it should never be sent by email and a classic error to be avoided is mass emails where the entire recipients can be seen in the address bar rather than using the bcc bar.
- Volunteers should not save copies of any HWR data onto their personal devices such as tablets, phone or laptops that have not been approved for such use by HWR IT Manager.
- Communication using personal email addresses between members of HWR is permissible provided the members have consented to such use and provided the data is not shared outside of HWR.

Data Accuracy:

The law requires that HWR takes reasonable steps to ensure that data is kept accurate and up to date.

It is the responsibility of all volunteers who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data should be held only by persons designated as HWR Data Processors.
- Every opportunity should be taken to ensure data is updated. For example by confirming an individual's data is correct when they call or visit.
- Data should be updated as soon as inaccuracies are discovered. For instance if an individual can no longer be reached on their stored telephone number or email address it should be removed from the database and anyone within HWR who might have similar data should equally be advised and updated.

Subject Access Requests:

All individuals who are the subject of personal data being held by Henley Women's Regatta (HWR) Ltd are entitled to:

- Ask what information HWR holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts HWR requesting this information this is called a subject access request.

Subject access requests from individuals should be made by email addressed to the head of the appropriate sub group within the Organising Committee or to the Chairman of HWR at chairman@hwr.org.uk Individuals will be charged £10 per subject access request.

The recipient of a subject access request will aim to provide the relevant data within 14 days of receipt of the request. However, before doing so, HWR must always verify the identity of anyone making a subject access request before handing over any information.

Disclosing Data for Other Reasons:

In certain circumstances the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances HWR will disclose requested data, however the relevant Data Processor will ensure the request is legitimate, seeking assistance from the Board and legal advisors if necessary.

Providing Information:

Henley Women's Regatta (HWR) Ltd aims to ensure that all individuals are aware that their data is being processed and that they understand:

- How the data is being used.
- How to exercise their rights.
- That the data will not be disclosed to any third party nor sold for marketing purposes. Under the principles of GDPR, HWR will provide clear access to its privacy policy. The privacy policy will be stated expressly on the HWR website via a prominent link.
- HWR will not adopt the principle of implied consent using pre ticked boxes on websites and apps. Conversely where applicable, individuals will have to consciously opt in to give consent for use of their data.

To this end the company will use the following privacy statement setting out how data relating to individuals is used by HWR.

Privacy Statement *(to appear on website or forwarded to individuals upon request).*

This privacy statement sets out how Henley Women's Regatta (HWR) Ltd uses and protects any information that you give HWR or when you use the HWR website.

HWR is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement for the purposes of effective running of Henley Women's Regatta.

Henley Women's Regatta (HWR) Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

What we collect:

We may collect the following information:

- Name and contact information including email address.
- Demographic information such as postcode, preferences and interests.
- Other information relevant to customer surveys.
- Video images of races which may include panning shots of regatta enclosure, towpath & public areas.

What we do with the information we gather:

We require this information to process our sporting event and to better understand your needs and to provide you with a better service, and specifically for the following reasons:

- Internal record keeping.
- Organise officials and volunteers duties and rotas.
- To periodically send promotional emails about news relating to the Regatta and associated operation that we think you may find interesting or of benefit.
- We may also use your information to contact you for market research purposes and may contact you by email, phone, fax or social media.
- We will never disclose your personal information to third parties nor sell your data to any other organisation without first seeking your personal and informed consent before doing so.
- Video Images will be broadcast live on the internet & uploaded for later viewing on the HWR You Tube channel & other social media. Prior notice of the filming & broadcast is publicly advertised. No individual is personally identified though athletes may be named in the commentary for which prior consent will have been obtained as part of the regatta entry process.

Security:

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable, physical, electronic and managerial procedures to safeguard and secure the information we collect.

How we use cookies:

A cookie is a small file which asks permission to be placed on your computers hard drive. Once you agree, (by clicking on the message in our website) the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. A web application can tailor its operation to your needs by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps our website administrators analyse data about webpage traffic and to improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. A cookie does not give us access to your computer or any information about you other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies but you can usually modify your browser setting to decline cookies if you prefer.

Links to other websites:

Our website may contain links to other websites of interest. However once you have used these links to leave our site, you should note that we do not have any control over that third party website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information:

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website look for a box requiring you to indicate that you consent for the information to be used by anybody for direct marketing purposes. If this is not ticked by you, it will not be shared for that direct marketing activity.
- If you have previously agreed to us using your personal information for direct marketing, you may change your mind at any time by giving us notification in writing or by emailing HWR.

We will not sell, distribute or lease your personal information to third parties without your prior permission.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable if you require a copy of the information we hold on you. Such requests can be made to the Chairman of HWR at chairman@hwr.org.uk

If you believe that any information we are holding on you is incorrect or incomplete, please write or email HWR as soon as possible and we will promptly correct any information found to be incorrect.

Abbreviated Privacy Statement (for use on forms, website data capture areas etc)

HWR respects everyone's privacy and will never sell, share or disclose your data to a third party without your express consent.

Video & Photographic images are taken throughout the regatta which may include not just images of competitors but spectators too.

We only retain data that is necessary for the effective operation of the event.

You may request to be removed from any database we retain or request details of any information HWR holds on you via our Privacy Statement on our website (click here) and for the full HWR Data Policy (click here) .