Haslemere Sub Aqua Club (HSAC) Privacy Policy

1) Introduction
General Data Protection Regulation (GDPR), came into effect in May 2018, relating to individuals' ***personal data*** and ***special categories of personal data***. This legislation applies to HSAC and controls how we collect and deal with all personal data in the context of membership (or associated relationship) with the club.

The Sub Aqua Association (SAA) provides a useful explanation of the GDPR regulations, privacy considerations and advice to clubs on their website (http://saa.org.uk/general-data-protection-regulation-gdpr/).

The following sections summarise how HSAC currently collects, stores, accesses and uses, and retains such data in the light of relevant aspects of GDPR legislation (special GDPR terminology is shown in ***bold italic***).

2) Legal Basis
The following legal bases are used to ***process*** personal information:-

In the case of registered subscription paying 'HSAC Members' - we rely on the concept of ***'legitimate interest'*** - i.e. data is used in a way that people would reasonably expect with minimal privacy impact in order to administer their membership and participation in club activities.

In the case of non-registered and non-subscription paying 'HSAC Friends' (i.e. former members & interested individuals) and 'HSAC Guests' (i.e. temporary visitors) - we rely on the concept of ***'consent'*** - i.e. a positive opt-in is obtained.

3) Data Collection
Personal information collected from 'HSAC Members' is obtained via signed membership applications, annual renewal forms or personal email communications and includes the following:-

Personal data :- i.e. basic information - collected for identification, communications and technical planning purposes directly related to scuba diving.

- Name; DoB; Home Address; Email Address; Telephone; Membership Category; Scuba Diving & Related Qualifications and Experience.
- Dive logs collect safety-related information about individual dives against members' names, and information relevant for that day eg any relevant pre-existing conditions such as achy shoulder.

Special categories **of personal data** :- i.e. more sensitive personal information - collected specifically for health and safety reasons directly related to scuba diving.

- Annual mandatory Medical Declaration/Medical Form
  A standard UK Diving Medical Committee Recreational Diver Medical Declaration form (https://www.ukdmc.org/downloads/) is required annually from every diving member. Where the self-certification form highlights a medical condition that may

not be compatible with safe diving, a medical consultation is required with a Diving Medical Referee (DMR). The details of the medical examination are confidential between the member and the DMR, and a signature page confirming the diver's fitness to dive (or otherwise) is all that is collected by the Club.

- Emergency Contact/Next of Kin details – name and telephone for the person to contact in the case of an emergency involving the member.
- The Treasurer collects the personal data required for gift aid declarations from members in order to reclaim tax from HMRC, as a registered CASC (Community Amateur Sports Club). Personal financial information such as HSAC Members' bank account details are **not** collected.

Personal data collected from 'HSAC Friends' is restricted to their email address, obtained from individual email communications. These emails restrict consent solely to the use of their email address to receive news and messages about the activities of HSAC. Such consent is reconfirmed on an annual basis.

Personal data and ***special categories of personal data*** are collected from 'HSAC Guests' in connection with temporary visits and/or attendance at club events and is obtained from signed permission forms (e.g. Try-dive forms, medical declarations) which record consent.

4) Data Storage

Personal data and ***special categories of personal data*** from 'HSAC Members ' , 'HSAC Guests' *and 'HSAC Friends'* as described above are stored by HSAC as original paper documents and password protected electronic files in secured U.K. premises.
'HSAC Members' ***personal data*** is shared with the SAA as part of a normal membership application / renewal with the SAA and will be used as stated in their privacy notice (http://saa.org.uk/wp-content/uploads/2018/05/Privacy-Notice.pdf).

For the avoidance of doubt the following personal information is NOT shared with the SAA:-

- 'HSAC Members' ***special categories of personal data***.
- 'HSAC Friends' ***personal data***.
- 'HSAC Guests' ***personal data*** and ***special categories of personal data***.

5) Data Access and Use

HSAC regards all personal information as CONFIDENTIAL and will not share or disclose any of your personal information held by the club without your consent unless there is a legal reason to do so.

All 'HSAC Members ', 'HSAC Friends' , and 'HSAC Guests' have significant wide ranging rights such as - access, rectification, erasure - concerning all personal information held by HSAC about them - implemented via a procedure known as a ***subject access request***. Any such requests received should be directed by email to the Membership Secretary or any current member of the HSAC Committee.

HSAC uses ***personal data*** from 'HSAC Members ' and 'HSAC Friends' to maintain and use general email distribution lists (i.e. the Google Groups "Haslemere Sub Aqua Club" group). HSAC uses 'HSAC Members' ***personal data*** to produce and distribute by email members' details including diving qualifications and experience, and emergency contact details. This listing is used solely for the purpose of planning and running dive excursions safely.

All Medical forms are collected by the Membership Secretary and/or Diving Officer who do not allow access to them by any other person. They are held by the DO who is formally responsible for all decisions and matters relating to diving safety.

HSAC restricts access to an electronic (password protected) list of Emergency Contact Details to senior members in the club (normally qualified to Dive Leaders and above) solely for Dive Marshall responsibilities. Paper copies are also held in a safe location onboard the dive boats in case needed in an emergency situation.

6) Data Retention

HSAC will retain ***personal data*** and ***special categories of personal data*** for any reasonable period of time to maintain relationships with existing 'HSAC Members', 'HSAC Friends' and 'HSAC Guests'. However, such data will not be held indefinitely and in normal circumstances will be deleted from club records two years from the date when:-

- 'HSAC Members' leave the club;
- 'HSAC Friends' do not reconfirm their annual consent to the use of their email address;
- 'HSAC Guests' make no further contact with the club following temporary visits and/or participation in club events.
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Dive logs collect safety-related information about individual dives (time, depth, gas consumption, equipment) against members' names (names only, no other contact information). These logs have to be retained by the DO for a minimum of two years. These sheets also contain useful information about dive positions, current and seabed conditions and may be kept for longer than this.

7) Comments and rights

Rest assured that HSAC will only use your personal data for the sole purpose of administering your membership and contacting you with information about club activities and scuba related matters - in other words - only information you would expect to receive from us. HSAC has never and will never share such data with anyone outside of the club environment or the Sub Aqua Association (SAA).

The SAA do not transfer members' data to any third parties, and use it only to administer memberships and to send email communications of relevance to the members.

Every member has a right to access the personal data being held by HSAC, to correct any inaccuracies, or to request deletion of the data. HSAC undertakes to comply with any such requests within a month, except where required otherwise by law (eg dive logs and diver details relating to diving and training activity must be retained for two years). Any member is free to make a complaint to the Information Commissioner's Office if they think there is a problem with the way we are handling their personal data.