

# Cambridge Climbing & Caving Club

## Data & Privacy Policy



### Data Statement

The Club undertakes to process your data lawfully, fairly, and transparently. We only collect data that's adequate, relevant, and limited to what's necessary for running the Club.

The data we collect, and how we use it, is outlined below.

### Data Controller

- The Cambridge Climbing & Caving Club (hereafter 'the Club') acts as the Data Controller for members' data.
- The current officers of the Club are listed on the Club website at <https://thecccc.org.uk/contacts/>.
- The General Secretary is the individual who maintains and operates the Club Data & Privacy Policy.

### Data Processors

Data Processors, who are able to process data on behalf of the Club for specific purposes, are:

- The President
- The General Secretary
- The Treasurer
- The Climbing Secretaries
- The Caving Secretary
- The Social Secretary
- The Webmaster

### Data Collected and Purpose

The Club collects the following data for the following purposes.

	<b>Data</b>	<b>Purpose / Legitimate Interest</b>
1	Name	<ul style="list-style-type: none"><li>• Required by BMC/BCA for Club membership and insurance.</li><li>• To communicate with the Member about Club activities, news, membership fees and renewals.</li></ul>
2	Email address	<ul style="list-style-type: none"><li>• Required by BMC/BCA for Club membership and insurance.</li><li>• To communicate with the Member about Club activities, news, membership fees and renewals.</li></ul>
3	Phone number	<ul style="list-style-type: none"><li>• Required by BMC/BCA for Club membership and insurance</li><li>• To communicate with the Member about Club activities, news, membership fees and renewals.</li></ul>
4	Address	<ul style="list-style-type: none"><li>• Required by BMC/BCA for Club membership and insurance</li></ul>
5	Date of birth	<ul style="list-style-type: none"><li>• Required by BMC/BCA for Club membership and insurance</li></ul>

6	Gender	<ul style="list-style-type: none"> <li>• May be required by BMC/BCA for Club membership and insurance</li> </ul>
7	Emergency Contact (Name, email, phone)	<ul style="list-style-type: none"> <li>• To notify the Member's family or other personal contact in the event of an emergency or accident while taking part in a Club activity.</li> <li>• This contact will be used for this purpose only, and only if the member is incapacitated, unable to communicate, or missing.</li> <li>• The member is required to ensure that the Emergency Contact has consented to be an Emergency Contact and to have their contact details shared with the Club for this purpose.</li> </ul>
9	Medical information & Allergies	<ul style="list-style-type: none"> <li>• Optionally provided by the Member and may be provided to trip organisers for awareness in case of a first aid situation. The member is required to provide allergy information to the organiser of any trip involving communal catering.</li> </ul>
10	Caving Experience	<ul style="list-style-type: none"> <li>• To help organisers of events understand participants' level of experience, to monitor safety, to implement provisional membership status, and to help us organise mentoring.</li> </ul>
11	Climbing Experience	<ul style="list-style-type: none"> <li>• To help organisers of events understand participants' level of experience, to monitor safety, to implement provisional membership status, and to help us organise mentoring.</li> </ul>

## Data Processing and Sharing

### SportMember

- The Data is provided by the Member and entered on the Club Portal on SportMember (sportmember.co.uk).
- The Member's Name (1) is visible to other Club Members on SportMember.
- The Member's other data (2-11) is visible only to the Data Processors, unless the Member chooses to make that data visible on their SportMember Profile or otherwise.
- The Member is responsible for reading and consenting to the separate SportMember terms and Privacy Policy and opting out of (or into) SportMember marketing.
- The Club's data processing may require your personal data to be transferred outside of the UK for the purpose of cloud hosting the Club SportMember Portal.
- Where the Club does transfer your personal data overseas it is with the appropriate safeguards in place to ensure the security of that personal data.

### Club processing of member data

- The data is only used for the legitimate purposes laid out above.
- The Member's data in categories 1-6 will be further shared with the British Mountaineering Council and British Caving Association for the purposes of obtaining Club Membership of those bodies, and the associated Liability Insurance for the Club.
- If further data is required of the member, or in the event that data needs to be shared with another person or body, further consent will be sought from the Member, with the following exceptions:

- In the case of a trip or event being organised by a Member who is not one of the nominated Data Processors, consent is deemed to have been given by the member for data to be shared once the member has requested to join the trip.
- The club will also release any information the member provides to statutory authorities e.g. Police, emergency services, cave rescue, mountain rescue, in the event of this being a reasonable requirement.
- In the case of some Caving locations, upfront provision of this data may be a pre-condition of obtaining a permit for the location.
- Separate to the membership database on SportMember, the Club operates an email list at the domain [all@thecccc.org.uk](mailto:all@thecccc.org.uk). By joining the Club, members are consenting to be added to this list. Members may receive Club announcements via SportMember mailouts or the email list.
- The Club also operates a WhatsApp Community. Members are invited to join this via a link. By doing so (which is optional) they are consenting to share their mobile number with other members of the Community.
- The Club also operates social media accounts. After Club events, the Social Media Secretary may want to share photographs on these social media accounts. Permission will be sought and obtained from both the photographer and the subjects of the photos before photos are shared.
- Payments are made either directly to the Club account via BACS, or via online payments on the Club Portal (SportMember). In the case of BACS transfer, bank account number and sort code may be visible to the Treasurer and co-signatories on the Club account. In the case of payments via SportMember, no such details are visible to the Club.

### Third Party Data & Privacy Policies

The Privacy Policies of the third parties we share data with are found at:

- British Mountaineering Council: <https://www.thebmc.co.uk/en/privacy>
- British Caving Association: <https://british-caving.org.uk/privacy-policy/>
- SportMember: [https://www.sportmember.com/users/privacy\\_policies](https://www.sportmember.com/users/privacy_policies)

The Club Website at thecccc.org.uk does not use cookies or collect any personal data.

### Data Retention & Erasure

- The Data is kept for the period that the Member joins the Club on SportMember up to the time when their membership expires, *plus* up to three months (the 'Sign-up Window' plus one month).
- This will normally mean that Data is initially kept from when they sign up (usually early January, or July in the event of half-year membership) until the end of the Sign-up Window of the following year (February 28<sup>th</sup>), plus at the club's discretion, one month's additional leeway to allow for late payments.
- Before or during the Sign-up Window, all Members will be notified to renew membership and to check and update their personal data on SportMember.

- If the Member has not renewed membership by the end of January, they will receive two further reminders in February.
- If they do not renew their membership by, at latest, March 31st they will cease to be a member of the Club. The Club will unlink their data from the Club on SportMember, the BCA and BMC portals, and will remove the Member from the WhatsApp community and email list. The Member will be notified of this. If the Member chooses to rejoin after this date, they will follow the new member process for this and will need to re-input their data.
- Once a former Member's data is unlinked from the Club on SportMember, the BCA and BMC portals, it is the responsibility of the Member to request complete deletion of their individual profiles and data on these third-party systems if they wish to do so.
- The Club will also remove the Member Profile and Data within one month, and remove them from the WhatsApp community and email list, if a member requests to leave the Club by notifying the Secretary ([secretary@thecccc.org.uk](mailto:secretary@thecccc.org.uk)).

### Your Rights

- You have the right to access, amend, correct or delete your Data at any time.
- For this purpose, you have access to your own profile on SportMember, the BCA and BMC portals and you are responsible for managing your own Data in these portals.
- In the event of a data breach, we undertake to notify you as soon as possible of the nature of the breach and measures you can take to protect your data.
- If you have further requests, questions or concerns regarding your Data, please contact the General Secretary at [secretary@thecccc.org.uk](mailto:secretary@thecccc.org.uk).