

# Privacy Notice

## What is the purpose of this document?

Southampton University Sub-Aqua Club (SUSAC) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all members of the organisation.

References to we, our or us refer to Southampton University Sub-Aqua Club.

SUSAC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The person responsible for data protection within our organisation is the Secretary who can be contacted at [privacy@susac.org.uk](mailto:privacy@susac.org.uk)

This notice applies to current and former members. This notice does not form part of any contract to provide services. We may update this notice at any time. When changes are made to this document, we will inform you electronically of the update, unless to correct typographical, spelling or grammatical errors.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions, when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Student / Staff ID number
- Age and date of birth
- Gender
- Next of kin and emergency contact information including name, title, addresses, telephone numbers, and personal email addresses
- Photographs and video recordings
- Diving qualifications and those relevant to diving such as first aid, including copies thereof
- BSAC membership information including start and end dates
- SUSAC membership status including start and end dates
- Records of your interaction with us such as telephone conversations, emails and other correspondence
- Credit / debit card and other payment details you provide so we can send /receive payments to / from you and records of these payments
- Identification documents such as passports and identity cards
- Your marketing preferences so that we know whether and how we should contact you
- Records of any grievances, disputes or disciplinary information
- Evidence of suitability to work with children or vulnerable adults

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health, sickness and medication records.

## How is your personal information collected?

We typically collect personal information about members through the membership joining process directly from members. We may sometimes collect additional information from third parties including the University of Southampton, the University of Southampton Students' Union and the British Sub-Aqua Club.

We may collect additional personal information in the course of member-related activities throughout the period of your membership with us.

## How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where you are a significant member of the organisation that we need to introduce to a customer or other third party.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

### **Situations in which we will use your personal information**

We need all the categories of information in the list above (see 'The kind of information we hold about you') primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Administering the contract we have entered into with you.
- Maintaining your personal details (e.g. your name, photograph, membership number and contact details), including ensuring effective communications with you.
- Keeping financial records.
- Assessing qualifications for a particular task.
- Complying with BSAC Safe Diving.
- Organising diving activities and associated requirements both in the UK and overseas.
- Ensuring your personal safety and wellbeing while undertaking diving activities with us.
- Maintaining a formal record of your activities with us.
- Training and development requirements.
- Safeguarding.
- Dealing with other third parties to whom your identity and background information is important.
- Dealing with legal disputes involving you, or other members, including accidents.
- Complying with health and safety obligations.
- To prevent fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.
- Managing society alumni relations and fundraising.
- Managing complaints made to us.
- Marketing and promotional purposes

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing access to our activities), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our members).

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our privacy notice.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our privacy standard.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

## Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our privacy notice.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate membership activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions where we need that information because of your role or our activities. We may be notified of such information directly by you in the course of your membership with us.

We will notify you if we believe we may need to collect such information. You do not have to provide such information, but it may restrict the activities in which you can partake with us if you do not.

We are allowed to use your personal information in this way to carry out our obligations.

## Data sharing

We may have to share your data with third parties, including customers, third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU for any of the purposes described in this notice.

If we do, you can expect a similar degree of protection in respect of your personal information.

## Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so. We may be subject to a legal requirement (with or without your consent) to share your personal information with the University of Southampton, University of Southampton Students' Union or a government agency (such as the police or security services or other statutory authorities with investigatory powers) under special circumstances (e.g. relating to tax, crime or health and safety). Where feasible and appropriate, we will notify you of our intention to share such information in advance. We may also share your personal information with third parties to enable us to perform the contract we have entered into with you and provide our services. We may also share photographs and video recordings for the purposes of marketing and promotion.

## Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

We will share personal information with the University of Southampton Students' Union as part of being an affiliated club or society, in order to process your membership, to run the club or society and for marketing and promotional purposes.

We share some of your personal information with the University of Southampton, including providing your Student I.D. number to Sports and Wellbeing if you wish to use the Jubilee Swimming Pool with SUSAC. We may also share personal data for marketing and promotional purposes.

We share some of your personal information with the British Sub-Aqua Club for the purposes of ensuring their records of your training and qualification are accurate as well as for marketing and promotional purposes.

We may share your personal information with certain organisations overseas, including dive shops and dive centres we may visit on a club trip, travel and accommodation providers and as part of arrangements related to your membership of the society. In such cases, we will ask for your explicit consent prior to transmitting this information.

Photographs and video recordings may be stored and hosted by third party websites with permission of the club. These include, but are not limited to, Facebook, Twitter and Instagram.

## How secure is my information with third-party service providers?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information under the general law or in line with our policies. We do not allow

our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **Data Retention**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, and usually only for up to three after your membership ceases. Training records may be kept for up to seven years after your membership ceases as required by BSAC. This may include for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a member of the organisation we will retain and securely destroy your personal information in accordance with applicable laws and regulations and as outlined above.

Photographs and video recordings may be stored and hosted by third parties beyond the length of time outlined in this document. Records will be kept of the locations of all shared photographs and video recordings for the duration of the time that they are stored and hosted.

### **Honorary Life members**

With regards to Honorary Life Members, for the purposes of the above, we will consider your membership to cease the September after your last active engagement at any club event. So that you are able to utilise your class of membership, SUSAC shall retain your name and membership status indefinitely. By engaging in a club activity after this date your membership will be reinstated until the above applies again.

### **How Secure is my Data?**

Our data is primarily stored on University provided networking services and is only accessible to those who are members of the committee. Data is encrypted at rest and in transit. Where third-party services are used, we will ensure that they provide similar data security and are GDPR compliant. Sensitive data, as listed above, will be afforded extra protection and only accessible to those with a need to know.

### **Rights of access, correction, erasure, and restriction**

#### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, or object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using the above contact details.

#### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the above contact details. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any updates. We may not inform you if we update this notice purely for correcting any typographical, spelling or grammatic errors. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact us on [privacy@susac.org.uk](mailto:privacy@susac.org.uk)**

**Last updated: 31/08/20**