

In accordance with the values and standards of the 3 Counties Snowsports (3CS) Data Protection Policy – we understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Club Members and clients. 3CS will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Our contact details (awaits details)

Name: 3 Counties Snowsports

E-mail: info@3countiessnowsports.org

Data Protection Manager: dataprotection@3countiessnowsports.org

What Does This Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers (name, address, date of birth and contact details)
- Emergency contact information
- Photographs
- Reviews
- Coaching and/or instructional notes
- Payment details
- Website user stats
- Information about your preferences and interests

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Providing and managing your account.
- Supplying our products or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- To assist deliver coaching or instructional services to you
- Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time by requesting the club to amend our booking system)
- With your permission and/or where permitted by law, and as recorded on our booking system, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products, service and Events. You will

not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

- We may share this information with Greenwich Leisure Limited

We also receive personal information indirectly, from the following sources in the following scenarios:

- Greenwich Leisure Limited – for Marketing and referrals of enquiries
- Eola.co / Stripe – our payment services provider, will provide payment and booking information as required for us to accept and confirm your booking(s)

We use the information that you have given us in order to;

- Providing and managing your account.
- Supplying our products or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- To assist deliver coaching or instructional services to you

Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information are:

(a) Your consent.

You are able to remove your consent at any time. You can do this by contacting the Data Protection Manager dataprotection@3countiessnowsports.org

This means you have given clear consent for 3CS to process your personal data and 3CS have made it clear what the specific purpose is.

(b) We have a contractual obligation.

This means, an agreement between you and 3CS – for example – membership of the club or you have asked 3CS to take specific steps before entering into a contract.

(c) We have a legal obligation.

This means that 3CS must comply with the law, it does not include contractual obligations.

(d) We have a vital interest.

For example, to protect someone's life.

(e) We need it to perform a public task.

In circumstances where it is necessary for 3CS to perform a task in the public interest or for other official functions providing the task or function has a clear basis in law.

(f) We have a legitimate interest.

This could include the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.

An example of the personal data we are likely to process:

For all bookings regardless of membership or not.

Data Item	Why	How long
Full Name	To Identify and communicate	1 year after last booking
Home address	For written communication in event necessary, including when no response to email or SMS	1 year after last booking
Email	For written communication regarding bookings and other services (if consent provided).	1 year after last booking
Phone	For communications regarding booking coordination and management or for welfare purposes (subject to consent)	1 year after last booking
Booking Date		
Booking Session Start time		
Number booked		
Date of Birth (if under 18 years)		
Name of responsible Adult (if appropriate)	For session coordination and management and welfare purposes.	
Contact for Responsible Adult (if appropriate)	For session coordination and management and welfare purposes.	

For all members.

Data Item	Why	How long
Full Name	To Identify and communicate	1 year after last membership expired
Home address	For written communication in event necessary, including when no response to email or SMS	1 year after last membership expired
Date of Birth	To validate class of membership	2 months after last membership expired
Email	For communications	2 months after last membership expired
Phone	For communications	2 months after last membership expired
Class of Membership	For fee calculation	1 year after last membership expired
If Family member, lead member	For fee calculation	2 months after last membership expired
Next of Kin	Just for session info or for duration of membership. In event of accident or injury. Will this be accessible in this case??	2 months after last membership expired
Preferred Communication method - Mail/SMS/email	For communications; also to validate Family memberships	2 months after last membership expired. Default to mail if membership not renewed within 2 months of expiry.
Publicity/Photo consent		2 months after last membership expired

For instructors/Coaches – to validate qualification

We would expect: Licence type (L1 Ski Instructor, etc) and number, awarding body (IASI, SE, etc), First Aid body and renewal date, Safeguarding Renewal date; Bindings Tech date done and renewal date; Disclosure done and renewal/Update service.

Qualification		2 months after last membership expired
Awarding Body		2 months after last membership expired
Date renewal due		2 months after last membership expired
Safeguarding due		2 months after last membership expired
1 st Aid due		2 months after last membership expired

For those we pay

Payee name		7 years??
Bank Account title		

Banks Sort code		
Bank A/C number		
a record of payments made??		

For Committee Members

Position; Date start; Date due re-election.

How we process and store your personal information

Application and annual renewals will be on paper. Written consents will be subject to regular review – if not renewed it will be withdrawn. Failure to renew within 2 months (so by end October each year) results in automatic deletion of all data except name, address and membership class unless deletion requested sooner.

Name, address and membership class will be deleted after 1 year of non-renewal or on request, whichever sooner.

Access to your data will be on a ‘need to know’ basis only. This means, only those who need to access your data can. The system is password protected and encrypted. Your data will only be accessed to manage and coordinate your membership and/or bookings unless you have consented for other legal and necessary reasons.

We will not share any of your personal data with any third parties for any purposes, subject to one important exception. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Photographs of you will only be taken with your permission. They will only be stored for specific purposes – agreed in advance with you. They will not be shared unless you have specifically agreed.

Your information is securely stored electronically and on paper retained at Gosling, Welwyn.

We keep the data in accordance with the charts above for the respective periods of time. We will then dispose of your information by electronic deletion or shredding if paper.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.
- Please contact us at dataprotection@3countiessnowsports.org if you wish to make a request.

How to access your Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held).

This is known as a “subject access request”. All subject access requests should be made in writing and sent to the email above.

To make this as easy as possible for you, a Subject Access Request Template and FAQ’s is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 Days and, in any case, not more than one month of receiving it.

Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request.

You will be kept fully informed of our progress.

Do include:

- a clear label for your request (eg use ‘subject access request’ as your email subject line or a heading for your letter);

- the date of your request;
- your name (including any aliases, if relevant);
- any other information used by 3CS to identify or distinguish you from other individuals (eg membership number);
- your up-to-date contact details;
- a comprehensive list of what personal data you want to access, based on what you need;
- any details, relevant dates, or search criteria that will help 3CS identify what you want; and
- how you would like to receive the information (eg by email or printed out).

Don't include:

- other information with your request, such as details about a wider customer service complaint;
- a request for all the information the organisation holds on you, unless that is what you want (if 3CS holds a lot of information about you, it could take them longer to respond, or make it more difficult for you to locate the specific information you need in their response); or
- threatening or offensive language.

How to contact 3CS

To contact 3CS about anything to do with your personal data and data protection, including making a subject access request, please use the template at the end of this Notice (for the attention of Data Protection manager):

Email address: dataprotection@3countiessnowsports.org At the conclusion of this Notice are some frequently asked questions to assist you further.

Changes to this Privacy Notice

3CS may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our Web presence.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at dataprotection@3countiessnowsports.org

3 Counties Snowsports (3CS) Privacy Notice



You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

To : dataprotection@3countiessnowsports.org

Dear Sir or Madam

Subject access request

[Include your full name and other relevant details to help identify you].

Please supply the personal data you hold about me, which I am entitled to receive under data protection law, held in:

[Give specific details of where to search for the personal data you want], for example:

- my training record;
- Membership details
- Photographs from training events;
- financial statements (between date and date) held for membership number xxxxx.]

If you need any more information, please let me know as soon as possible.

[If relevant, state whether you would prefer to receive the data in a particular electronic format, or printed out].

It may be helpful for you to know that data protection law requires you to respond to a request for personal data within one calendar month.

If you do not normally deal with these requests, please pass this letter to your Data Protection Manager.

If you need advice on dealing with this request, the Information Commissioner's Office can assist you. Its website is ico.org.uk, or it can be contacted on 0303 123 1113.

Yours faithfully

[Signature]

Frequently asked questions

Can I make a subject access request verbally?

Yes. You can make a subject access request verbally, but we recommend you put it in writing if possible because this gives you a record of your request.

If you are making a verbal request, try to:

- use straightforward, polite language;
- focus the conversation on your subject access request;
- discuss the reason for your request, if this is appropriate – work with them to identify the type of information you need and where it can be found;
- ask them to make written notes – especially if you are asking for very specific information; and
- check their understanding – ask them to briefly summarise your request and inform them if anything is incorrect or missing before finishing the conversation.

However, even if you make your request verbally, we recommend you follow it up in writing (eg by letter, email or using a standard form).

Should I use an organisation's standard form?

Standard forms are not compulsory and are not always provided. However, an organisation may ask you to use theirs.

Standard forms can make it easier for an organisation to deal with your subject access request. They can:

- structure your request;
- prompt you to include necessary details and supporting documents; and
- let you know the best contact point at the organisation.

However, you can still choose another method to submit your request.

Can someone else make a request on my behalf?

Yes, you can authorise someone else to make a subject access request for you. However, you should consider whether you want the other person to have access to some or all of your personal information.

Depending on the nature of your request, the other person could gain access to information that you may not want to share with them, such as your medical history.

Examples of individuals making requests for other people include:

- someone with parental responsibility, or guardianship, asking for information about a child or young person (for further information, please read our guidance for organisations on requests for information about children);

- a person appointed by a court to manage someone else’s affairs;
- a solicitor acting on their client’s instructions; or
- a relative or friend that the individual feels comfortable asking for help.

An organisation receiving the request needs to be satisfied that the other individual is allowed to represent you.

They may ask for formal supporting evidence to show this, such as:

- written authorisation from you; or
- a more general power of attorney.

It is the other person’s responsibility to provide this when asked to do so.

Should I keep a record of my request?

Yes – whenever possible, we strongly recommend that:

- you keep a copy of any documents or written correspondence for your own records;
- you keep any proof of postage or delivery (such as a postal reference number), if available; and
- if using an online submission form, you take a screenshot before sending.

Where relevant documents are not available for you to copy, consider making a written log of your request. This should include key details, such as:

- the date and time of your request;
- the location (eg if your request was made in person);
- the contact number or submission form you used;
- the details of any contacts you have interacted with;
- notes about any personal information you asked for;
- any further information that the organisation may have asked you to provide;
- any reference numbers given to you; and
- any other relevant information.

This will provide helpful evidence if you wish to:

- follow up your request;
- raise concerns; or
- complain about an 3CS’s response, at a later stage.