

LONDON NO1 PRIVACY NOTICE FOR ITS MEMBERS, OTHER USERS OF ITS SERVICES, SERVICE PROVIDERS AND WEBSITE USERS

Introduction

Welcome to BSAC LONDON NO1'S (London No1) privacy policy.

London No1 respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website or social media accounts (regardless of where you visit it from), contact us about becoming a member or to book a try dive or refresher course and when you become a member, or if you are a service provider. It will also tell you about your privacy rights and how the law protects you.

Please use the Glossary at the end of this privacy notice to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how London No1 collects and processes your personal data through your use of this website, when you make enquiries or book our services and when you become a member or our service provider. The British Sub-Aqua Club ("BSAC"), the national scuba diving organisation of which we are a member club and of which you must also become an individual member to join our club, is an independent controller and so please visit its privacy notice [here](#).

This website is not intended for children and we do not knowingly collect data relating to children unless it is with specific parental and that child's consent. We may be able to provide training courses for children and any enquiries about such courses must be directed to our Welfare Officer (at committee@londondiver.com).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements any other notices and privacy policies from time to time issued by London No1 and is not intended to override them.

Controller

The committee of London No1 is the controller and responsible for your personal data (collectively referred to as "London No1" "we", "us" or "our" in this privacy policy).

Given that London No1 is a sports club with voluntary committee members, the committee will deal with and appoint on an ad hoc basis, appropriate individuals to handle questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your data protection rights, please direct those to committee@londondiver.com. Our informal data protection officer (DPO) may change from time to time and so the committee will designate the relevant person at the time to deal with your query or request.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in February 2019.

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

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, BSAC member number and users names on the social media platforms we use (Facebook, Instagram, YouTube and Twitter), title, date of birth and gender.
- **Contact Data** includes residential address, email address, social media handles and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of memberships, courses, products and services you have purchased from us.
- **Technical Data** can include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website. However, we do not currently monitor the performance of our website or website activity. We therefore do not have a cookie policy at present. External Third Parties connected with our website, such as Twitter, might use your cookie data and they act as independent controllers and should have their own privacy notices. Please contact our DPO at committee@londondiver.com if you have any questions or queries about these matters.
- **Profile Data** includes your scuba diving level and qualifications, stated interests and preferences about scuba diving and related activities, which courses you undertake and yours/our feedback on your progress and any survey data you provide (although usually we ask for that on an anonymous basis)].
- **Usage Data** includes information about how you use our website.

- **Marketing and Communications Data** includes your preferences in receiving marketing and communications from us and any relevant (scuba diving related) third parties and your communication preferences.

We might collect **Special Categories of Personal Data** about you in certain circumstances. So you know, Special Categories of Personal Data includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, and genetic and biometric data). Our use of Special Categories of Personal Data is likely to be limited to the use of health data for members and users of our try dive and refresher services as may be necessary to obtain and use to run a safe and responsible scuba diving club.

We do not currently collect any information about criminal convictions and offences, although the Welfare Officer will keep this under review depending on what courses we may provide to children in future.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a try dive, a refresher or scuba diving training). In this case, we may have to cancel a membership, course, product or service you have with us but we will notify you if this is the case at the time.

3. **How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial Data, Profile Data and Marketing and Communications Data and Special Categories of Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our membership, courses, products or services and engage with us on an ongoing basis about those;
 - request marketing to be sent to you;
 - enter a survey
 - engage with us on social media; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** We do not currently employ any automated technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties including specifically BSAC.
- Contact, Financial and Transaction Data from providers of payment and delivery services such as banks.

4. How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

Please visit the Glossary at the end of this privacy notice to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, save where we require health data, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us or by clicking unsubscribe in any such emails.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member and update BSAC about that	(a) Identity (b) Contact (c) Financial (d) Profile (e) Health	Performance of a contract with you Consent for health data
To process your request for our courses, services and products including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) and BSAC's legitimate interests to be kept appropriately updated about its members

<p>(b) Collect and recover money owed to us</p> <p>(c) Ensure appropriate courses, services and products are provided and BSAC is updated</p>	<p>(e) Marketing and Communications</p> <p>(f) Profile</p> <p>(g) Health</p>	<p>(c) Consent for health data</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Delivering our courses, services and products, including dealing with any medial issues that may result</p> <p>(b) Notifying you about changes to our terms or privacy policy</p> <p>(c) Asking you to leave a review or take a survey</p> <p>(d) engage with you on social media (please note that those social media platforms are also independent controllers – on those sites we can only choose to take down or leave up your posts to us, or reply to you)</p> <p>(e) engage with our service providers for the performance of their services</p>	<p>All types of data as mentioned above</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and improve the running of our club)</p> <p>(d) Consent for health data, save in emergencies when you are unable to provide consent and in which case we will process your health data to protect your vital interests</p>
<p>To administer and protect our club and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>All types of data as mentioned above</p>	<p>(a) Necessary for our legitimate interests (for running our club, provision of administration and IT services, network security and to prevent fraud)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To make suggestions and recommendations to you about courses, goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our courses/products/services and grow our club)</p>

	(f) Marketing and Communications	
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Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties as set out in the Glossary.

6. International transfers

As far as we are aware, we do not transfer your personal data outside the European Economic Area (EEA) for official club business and any External Third Parties who might do so are independent controllers.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those club members, agents, contractors and other third parties who have a legitimate need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We do not use automated decision making in respect of your personal data.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Generally, we will keep personal data during our period of engaging with you and for six years thereafter.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

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

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our club in conducting and managing our club to enable us to give you the best service/product and the best and most safe experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

External Third Parties

- BSAC and, where you have given consent, other scuba diving related organisations.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Medical professionals and organisations.