

# South Wales Caving Club – Privacy Notice September 2023

This Privacy Notice tells you what to expect when SWCC collects and processes personal information.

Note: we may change this Privacy Notice by updating this page. We will advise Members separately of any changes that we make, by email or our eNews, but you should check here from time to time to ensure that you are still happy with our policy.

This Privacy Notice is effective from September 2023. It will be reviewed annually and updated as necessary.

## Introduction

SWCC is committed to processing any personal information that it holds only in ways that are fair, transparent and meet its legal obligations – in other words, in accordance with the Data Protection Act 1998 and its successor the General Data Protection Regulation (GDPR). <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

SWCC will take particular care over email addresses which, in addition to the GDPR, are subject to the Privacy and Electronic Communications Regulations (PECR). <https://ico.org.uk/for-organisations/guide-to-pecr/>

## Data Protection Principles

The legislation sets out various data protection principles. These include the need to ensure that personal information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is necessary
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

## Your rights

The legislation conveys various individual rights to you as the Data Subject. These include the following:

- the right to be informed of the data which are held
- the right of access to your data
- the right to rectification of incorrect data
- the right to have data erased
- the right to restrict processing of your data
- the right to data portability
- the right to object to our use of your data
- rights related to automated decision making and personal profiling

The sections towards the end of this Privacy Notice let you know how you can exercise your rights. You can read more about your rights at <https://ico.org.uk/for-the-public/>

## **Information that SWCC processes and holds**

The following sections describe the information that SWCC collects and how it is processed.

### **SWCC Members**

#### ***SWCC's legal basis for processing your data***

The legislation requires that there is a clear legal basis for processing personal information. In general, SWCC relies on its legitimate interest to use your information for all membership administration and related purposes. Where there are exceptions such as your explicit consent, a legal obligation or a contractual agreement with yourself, they are noted below.

#### ***Membership details***

We collect contact and membership details for administrative purposes and to provide membership services. These include, but are not limited to:

- administration of joining and renewals
- distribution of publications, including eNews
- the organisation of meets or training courses
- administration of BCA membership and insurance
- notifications of General Meetings

While we attempt to make sure that the details which we hold for you are up to date, we are ultimately reliant on you to inform us when there are changes.

We ask, on a voluntary basis, for your date of birth. If you provide us with this information, which we will use only to help us understand our membership demographics and for some age-related membership administration purposes, we will also provide it to BCA. We will consider your provision of this information as giving consent for these purposes.

#### ***Email addresses***

If you have provided an email address then we will use it for membership administrative purposes as noted above.

We also provide your email address to BCA, although you may opt out by contacting our membership administrator at [membership@swcc.org.uk](mailto:membership@swcc.org.uk). BCA will use this information in accordance with its own privacy policy, which you may wish to view at <https://british-caving.org.uk/privacy-policy/>

We will not use your email address to send you marketing information and we will not share it with any third party for marketing or commercial purposes without your explicit consent and without imposing a similar condition upon them.

#### ***BCA***

We will share your membership details and postal details (but not telephone numbers) with BCA. We may share your BCA membership status with other caving clubs of which you are a member or with cave access bodies.

As noted above, if you have provided us with your date of birth we will also provide it to BCA. We will also provide BCA with your email address to enable it to communicate directly with you as one of its members, unless you have specifically requested that this is withheld.

At the request of BCA we may forward BCA communications to you by email.

### ***Web site registration***

If you have registered to access the private area of the website then we will consider that you have consented to your user name and email address being held for this purpose.

### ***Facewall***

If you have provided your photograph for the Facewall on the website then we will consider that you have consented for it to be published in this way. We will not update your photograph unless you provide us with a new one.

### ***Members' address list***

If you are a Member and have given your explicit consent we will include your contact details, including email address and telephone numbers, on an address list which will be provided to all Members for their own personal use only. You may ask for some of your details to be withheld.

### ***Data retention***

If your membership lapses we will immediately unsubscribe you from our eNews and other mailings and will remove your photograph from the Facewall.

We will retain electronic records of your membership data for the current and the previous two years, to enable us to identify you and to facilitate any request which you may make to have your membership reinstated.

We will retain your original hard copy application forms indefinitely for historical and archival purposes. We will also retain indefinitely any information which may be contained in the Minutes of General Meetings or of Committee Meetings.

### **Website visitors**

When someone visits our website(s) we may use a third party service to collect standard internet log information and details of visitor behaviour patterns. We may do this to find out things such as the number of visitors to various parts of the site, in order (for example) to tailor the website to meet visitor needs. This information is processed only in a way which does not identify anyone.

### ***Links to other websites***

This Privacy Notice does not cover links from our website to other websites. We encourage you to read the privacy statements on any linked websites that you visit.

### **Caving Permit and Cave Key Applicants**

We retain the information provided in support of caving permit applications, cave key applications and midweek access to cave keys. We use this for a variety of administrative purposes, including cave key inventory control, Annual Permit reviews and the production of cave usage statistics. Data are retained for the current and previous calendar years.

## **HQ visitors**

We ask visitors to the HQ at Penwyllt to sign in on arrival. The information is used for HQ management purposes, to enable us to collect any fees which may be due and for accountancy purposes.

Information relating to overnight stays and other transactions is collected and may in addition include the last four digits of a payment card for some forms of transaction. These 'Hut Sheets' are retained for the current and the two previous financial years.

Where a booking to stay at the HQ has been made in advance on behalf of a club or group we retain the contact details that have been provided until we are advised of a change.

The call-out board at the HQ is no longer in routine use, although it remains available for use by parties who have made their own arrangements for it to be monitored. The 'Trip Tickets' used for this purpose are no longer used as the basis for cave usage statistics and are not retained.

## **Suppliers and Other Third Parties**

### ***Use of External Data Processors***

External Data Processors are third parties who provide services for us. They cannot legally do anything with your personal information unless we have instructed them to do it, which we will do only in accordance with this Privacy Notice. They will hold your information securely and will not share it with any organisation apart from us. The following is a list of our main external Data Processors, but it is not exclusive and there may be others from time to time.

### ***Posting***

When sending letters, publications and purchases we will share your postal address with the delivery service, normally Royal Mail.

### ***Website hosting***

We use a third party service provider, currently Heart Internet <https://www.heartinternet.uk/company> to host our website. They are contractually obliged to treat any information on our private website as confidential and only to use such information for the purpose of providing SWCC with web hosting.

### ***Electronic hut sheets and cave key control***

We use a third party service provider, currently Google, to enter and store the data in an access-controlled spreadsheet.

### ***Payment Service Providers***

We use online Payment Service Providers (PSP) to take payments. Only sufficient information is shared with them to complete the transaction.

We use SumUp and PayPal for some transactions. Where payment is made by credit or debit card we do not see and do not retain the card details, since these are handled by the PSP, except that for SumUp transactions recorded on the HQ signing-in sheet we retain the last four digits (only) of the card number to enable us to match payments to the appropriate entry.

We use Barclays Bank as our banking service provider. Where payment is made to us by online transfer (BACS) we do not see and do not retain your account details. Where we need to make an online payment to you, we will need to ask you for your bank sort code and account number but we will not retain that information once the transaction has been processed.

### ***Insurance***

As noted above, we will share your membership details with BCA, since this is the route through which caving third party liability cover is provided. In the event of a claim, BCA will share those details with their insurance provider.

### **International data transfers**

Your personal information will be stored in accordance with the GDPR.

The GDPR applies to both UK and EU residents. If we share personal information of UK or EU residents with suppliers or third parties outside the EU we will ensure that they meet the requirements of the GDPR.

When dealing with non-EU residents we are committed to complying with the data regulations of the appropriate legal jurisdiction.

### **Data security**

We have implemented appropriate levels of technical and organisational security measures to protect your personal data against unauthorised access, loss or misuse. It is not appropriate to describe these here.

We will review our security measures regularly and implement any necessary improvements.

### **Queries and complaints**

This Privacy Notice does not provide exhaustive detail of all aspects of our collection and use of personal information. We are happy to provide on request any additional information or explanation that you may need. See 'How to contact us' below.

We try to meet the highest practicable standards when collecting and using personal information and we therefore encourage you to bring it to our attention if you think that our collection or use of information is unfair, misleading or inappropriate.

If you want to make a complaint about the way we have processed your personal information, please contact us as described below. A formal complaint should be made in writing. We will take any complaint that we receive very seriously. Confidentiality will be preserved during our investigation of any complaint to safeguard the interests of everyone concerned, unless disclosure is necessary to progress the complaint.

## **Access to your personal information**

We try to be as open as we can be in terms of giving people access to their personal information. Individuals can find out if we hold any of their personal information by asking – this is formally known as a 'subject access request' under the Data Protection Act. If we do hold information about you we will:

- give you a description of it
- tell you why we are holding it
- tell you to whom it could be disclosed
- let you have a copy of the information in an intelligible format

If we do hold information about you, you can ask us to correct any mistakes.

To make a formal subject access request you will need to put the request in writing to the address below. We will not normally charge for your request.

If you agree, we will initially try to deal with your request informally, for example by providing you with the specific information that you need over the telephone.

## **Disclosure of personal information**

Other than as described elsewhere in this Privacy Notice we will not disclose personal data without consent, except that consent is not required and will not be sought where we have a legal obligation to disclose information to government agencies or entities, regulatory authorities or other persons in line with any applicable law, regulations, court order or official request.

## **How to contact us**

Email the SWCC Data Controller via the link on our website or directly at [datacontroller@swcc.org.uk](mailto:datacontroller@swcc.org.uk)

If you wish to make a formal subject access request, write to us at our Headquarters:

Data Controller  
South Wales Caving Club  
Powell Street  
Penwyllt  
Swansea  
SA9 1GQ

If writing, please also email (with a copy to the SWCC Secretary [secretary@swcc.org.uk](mailto:secretary@swcc.org.uk)) to advise that a request is being submitted, since post may not automatically be forwarded.

Last reviewed: 27 August 2023

Adopted at Committee Meeting of 25 September 2023.