

# BSAC Sub Aqua Club 'Edinburgh Divetech BSAC 1067' Privacy Notice (Rev 1 Sept 2019)

## What personal information do we hold?

The personal information we hold will depend on the relationship you have with Divetech.

If you are a club member we may hold:

- Personal and contact details such as title, full name, contact details and address
- Your date of birth and gender
- Family members (if joint or family membership applies)
- Photograph
- Medical information, where specifically relevant to diving related activities
- Social media identifiers

If you contact us with an enquiry we may hold:

- The contact details you provide or use to contact us
- Any other information you provide during your enquiry

If you visit our web site, we may hold:

- Your IP address as part of web site analytics

## How is personal information collected?

Personal information may be collected with the consent of the user by way of direct submission, interactive submission or submission via the BSAC website.

## How does Divetech use this information?

There are various reasons why personal information is gathered electronically which includes but is not limited to;

- Provision of electronic services that require a user's authenticity to be established
- Provision of other services offered by Divetech and/or BSAC
- Participation in electronic surveys
- Participation in events offered by Divetech
- Distribution of membership list to club members

Information gathered with the explicit consent of the user will only be used for the purpose for which it was intended except in those circumstances where Divetech must provide it to fulfil statutory obligations. Divetech may use personal details to contact users directly for the purposes of obtaining further information needed to fulfil the original purpose.

Divetech may use personal information to contact users by electronic or physical means including but not limited to;

- Sending e-mail to those that have requested it
- Telephoning users to obtain additional information and clarification
- Other electronic and physical correspondence

Information that is gathered automatically without the explicit consent of the user will not be used by Divetech to identify an individual. Divetech may use this information for the purposes of demographic and statistical reporting with the purpose of enhancing the services that it offers to Divetech members and other users.

### What is the legal basis for processing your personal information?

We rely on the following legal bases to use your personal data:

Where it is needed to provide you with our services to you as a member, such as:

- Processing an application for a membership subscription you hold with Divetech/BSAC, including the price, the payment methods available and the conditions to attach
- Managing your subscription with Divetech/BSAC, or an application for one
- Updating your records to keep you up to date with your subscription and contact you regarding renewal

Where it is in our legitimate interests to do so, such as:

- Updating your records to keep you up to date with your subscription and contact you regarding renewal or important branch information.
- To perform and/or test the performance of our service to Divetech members
- For management and audit of our operations including accounting
- To administer our good governance requirements such as internal reporting and compliance obligations or administration required for AGM processes and changes to committee
- To comply with our legal obligations

### How long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable needs, such as managing our relationship with you and managing our service to you as a member
- For as long as we provide services to you as a member
- Retention periods in line with legal and regulatory requirements or guidance

### Information shared with others

We may at times share some of your personal information with BSAC and/or other members of the club as part of providing our service to you. In these cases, your data will be processed under the privacy policy of the receiving party.

If you provide any other members your personal information while taking part in any club activity, this information will not be covered by the Divetech privacy policy.

## What should you do if your personal information changes?

You should tell us so that we can update Divetech and /or BSAC records.

## Do you have to provide your personal information to us?

We're unable to provide you with our services to you as a member if you do not provide certain information to us. In cases where providing some personal information is optional, we will make this clear.

## What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

## Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us at [divetechinfo@gmail.com](mailto:divetechinfo@gmail.com) to exercise these rights.

## What are your marketing preferences and what do they mean?

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us at [divetechinfo@gmail.com](mailto:divetechinfo@gmail.com).

## Security

Divetech will take reasonable precautions to ensure that the personal data it gathers in the course of operating electronic computer systems will be kept securely and within the control of an appointed committee member of Divetech at all times. Divetech will take reasonable precautions to ensure that all representations made for and on behalf of Divetech will be clearly identifiable.

## Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you revisit our website.

## Contact us

If you have any questions or comments about this privacy notice, or if you wish to exercise your rights or contact the Data Protection Officer, which for the purposes of GDPR is the current Divetech Club Secretary at [divetechinfo@gmail.com](mailto:divetechinfo@gmail.com)