

Cambridge University Cycling Club – Privacy Notice

This statement explains how the Cambridge University Cycling Club (“CUCC”, “we”, “us” and “our”) handles and uses the personal information we collect about our members (“you”, “your”) for processes relating to our operations and activities.

When changes are made to this statement, we will publish the updated version on our website and email you.

The controller for your personal information is Cambridge University Cycling Club. The person responsible for data protection within our society is the General Secretary who can be contacted at c.u.cycling@sport.cam.ac.uk.

Personal data that we hold

We may hold information relating to you from a number of sources. A significant proportion of the information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by telephone, email or otherwise).

Most records contain:

- details of your education (e.g. your college, the courses you have completed, dates of study)
- unique personal identifiers and biographical information (e.g. CrsID, date of birth)
- your contact details (and we update these whenever you let us know that they have changed)
- details of your interactions with us, including:
 - your membership and achievements with us
 - your attendance at our events
 - other contact with us or our partners (as listed below)
 - details of benefits and services provided to you
- details about your family (e.g. emergency contact details)
- personal data provided by you for a specific purpose (e.g. disability and dietary preferences for event management purposes)
- your communication preferences, to help us provide tailored and relevant communications

We also record, where applicable, based on information which you provide to us and, in some cases, publicly available information and information from our partners (as listed below):

- financial information relating to you and your family, including:
 - your history of donations made to us
 - your ability and willingness to make donations, including our assessment of your income and whether particular donations or funding appeals may be of interest to you
 - your philanthropy and other giving, including donations to other organisations and other support that you provide (e.g. details of volunteering roles)
- your career highlights and other life achievements

- information about your areas of interest and extra-curricular activities

We may augment the data we hold with data from our partners (as listed below) and publicly available data.

We may use targeted internet searches and may search the following websites (either directly or using search engines), where relevant, in order to obtain and maintain the accuracy of the data listed above:

- Public sources for individuals:
 - Sunday Times Rich List
 - Other rich lists, including Forbes Magazine's international rich lists
 - The Queen's Honours Lists
 - LinkedIn, to check business details
- Press sources, for negative press for due diligence purposes

How we use your personal information

We collect and process your personal information for a number of purposes, including:

- Club Communications:
In order to provide you with information, we will use your contact information to send you emails about club activities, developments, notifications and ways in which you can support us (alumni). We will retain your contact information for as long as you wish to be contacted by the club, both in your capacity as a current member, and your future capacity as an alumnus.
- Health and Safety:
We collect information regarding emergency contact details as part of our health and safety information. We will only use this information in the case of your involvement in an accident where it is deemed necessary to communicate with your nominated emergency contact.
- Third Party Marketing:
We require your consent to share your contact information with third parties who sponsor the club and may wish to send you relevant marketing information. We will share your information for as long as we have consent to do so, and no longer than the duration of your membership with the Club. The option to give consent is found in the membership application form.
- Administrative purposes:
e.g. in order to process a donation that you have made, or to administer an event you have registered for or attended.

Before seeking or accepting major donations we are required to conduct due diligence, including reviewing publicly available personal data relating to the donor's criminal convictions and offences.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us using the details listed below.

We may use automated or manual analyses to link data together to help us identify your potential for supporting us, to provide you with an improved experience, to send you communications which are relevant and timely, to identify volunteering opportunities or opportunities for providing support which may be of interest to you, and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise more funds, sooner, and more cost-effectively, in support of our strategic objectives. We always seek to ensure that any opportunities we present are aligned with your interests, based on the research we conduct.

We will always respect a request by you to stop processing your personal data, and in addition your statutory rights are set out below.

How we share your personal information with others (our partners)

We share the above categories of data with the University and the Colleges to provide you with a coordinated approach. Any transmission of data to or from the University and Colleges is managed through agreed processes which comply with relevant data protection legislation. The University and each College has its own data protection statement and procedures.

We share the above categories of data on a considered and confidential basis, where appropriate, with:

- We share some of your personal information with the University and Colleges, only where there is a specific need to, including for registration as a University Sports Club, and to provide your blues and sporting records for your University records.
- We share some of your personal information with CUCC partners, such as sponsors (E.g. South downs Bikes, for the purposes of receiving the sponsorship benefits from these organisations), companies that provide us with data about alumni and supporters and other contractors providing services to you on our behalf or services to us.
- We may also be subject to a legal requirement (with or without your consent) to share your personal information with the University 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.

How we protect your data

We ensure we have appropriate data sharing arrangements in place before sharing your personal data.

We do not sell your personal data to third parties under any circumstances.

We also facilitate communication between individual members, but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas (outside of the European Economic Area), as set out above, are protected either by an 'adequacy decision' by the European Commission (declaring the recipient country as a 'safe' territory for personal data) or by standard contractual clauses adopted by the European Commission (which give obligations for the recipient to safeguard the data). Further information about the measures we use to protect data when being transferred internationally is available from us (via the contact details are set out below).

Your rights

You have the right to access the personal information that we hold about you. You also have the right to ask us to correct any inaccurate personal information we hold about you, to delete personal information, or otherwise restrict our processing, or to object to processing or communications, or to receive an electronic copy of the personal information you provided to us. Please note that all of these rights are qualified in various ways.

If you have questions or concerns about how your personal information is used, please contact us using the above details.

If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

Further information

The legal basis for processing your personal data for the interdependent purposes set out above is that it is necessary for the pursuit of our legitimate interests. We always handle your personal data securely and minimise its use, and there is no overriding prejudice to you by using your personal information for these purposes. In addition, there is no statutory or contractual requirement for you to provide us with any personal data.

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Please contact us if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.

We will retain your data indefinitely in support of your lifelong relationship with us or until you request us to do otherwise. We will publish any changes we make to this data protection statement and notify you by other communication channels where appropriate.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, membership details, unique identification number and date of birth) to ensure we do not contact you inadvertently in future. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

Last updated: 27/01/2019