

BWSW Privacy Policy



Scope

This policy document aims to provide you with information about how The British Water Ski & Wakeboard Federation Limited ("BWSW") process and use your personal information. BWSW is registered in England and Wales under company number 00913182 and registered address at Unit 3 The Forum Hanworth Lane Chertsey KT16 9JX.

If you are aged 16 or under, please obtain your parent/guardian's permission before you provide any personal data to us.

For the purposes of the policy, "personal data" shall mean any information that can be used to identify, contact or locate an individual.

About BWSW

BWSW is committed to protecting and respecting your privacy and complying with the principles of applicable data protection laws. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Collection of personal data

BWSW may collect and/or create or otherwise obtain and process personal data from you in the following ways:

- when you register to become a member of BWSW;
- when you subscribe to receive our communications or posting material; or
- when you complete forms while registering for activities and making purchases on our website www.bwsw.org.uk; and
- we may also ask you to complete optional surveys that we use for research purposes and to provide you with a more relevant customer experience.

Categories of personal data

The personal data we may collect from you includes:

- **Identity Data** – your first name, surname, marital status, gender, demographic and photograph images (e.g. collected via social media where you have given us permission to use such images).
- **Contact Data** – email address, telephone number, billing address and delivery address.
- **Financial Data** – bank account and payment card details.
- **Technical Data** - 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, device ID and other technology on the devices you use to access this website.

- **Profile Data** – your username and password
- **Usage Data** - information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Transaction Data** – details concerning payments you have made to BWSW

Uses made of your information and the basis of processing

BWSW will use your personal data to:

- Ensure that content from our websites is presented in the most effective manner;
- Authenticate you when you register;
- Carry out our obligations arising from any contracts entered into between you and BWSW;
- Provide you with information, products or services that you request from BWSW or which we feel may interest you, where we are legally entitled to do so;
- Enable people to join events, rides, clubs and groups and communicate with each other via the BWSW system as part of that activity;
- Allow you to participate in interactive features of BWSW's service, when you choose to do so;
- Notify you about changes to our service;
- To gather statistics about memberships and people interested in our sport; or
- To segment your personal data to make sure that you only receive information that is relevant to you. For example, if you live in London, to make sure that you do not receive information about events in Glasgow.
- Publish and maintain a comprehensive set of results and rankings for the sport in all its recognised disciplines.

BWSW will not use any of the personal data we collect from you to make automated business decisions.

The legal basis on which we collect and process the personal data described above depends on the personal data concerned and the specific context in which we collect it. Please see the table below which sets out the categories of personal data we collect and the legal bases we rely on to do so.

Purpose/Use	Type of data	Legal basis
To register you as a new BWSW member	(a) Identity (b) Contact	Performance of a contract with you
To process and provide your member services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

Purpose/Use	Type of data	Legal basis
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as the possible consequences if you do not provide your personal data).

Failure to Provide Personal Data

Where we need to collect personal data from you in accordance with any applicable law, or under the terms of any agreement we have with you, and you fail to provide that data, we may not be able to perform the agreement we have or are trying to enter into with you (for example, delivering the products and services you have requested).

Information security

BWSW will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice. Unfortunately, the transmission of information via the internet is not completely secure and, although we will do our best to protect your personal data transmitted to us via the internet, we cannot guarantee the security of your data transmitted to our website from your device. Any transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share such a password with anyone.

Where any payments are being collected on our behalf, we require our payment providers to be compliant with the Payment Card Industry's Data Security standards (PCI-DSS).

Recipients of personal data

We may need to share your personal data with some of our suppliers who process data on our behalf to help us to provide services to you e.g. to provide the issue of magazines and membership cards.

Your personal data may be disclosed to the third parties set out below. We undertake this data sharing on the basis of our legitimate interests.

Categories of organisation and purpose

- **Marketing agencies** - to provide relevant digital content to our customers
- **Database hosting companies** - to host our digital platforms (e.g. www.bwsw.org.uk) and associated customer databases to enable customers to log in and interact with the website
- **Email broadcasting companies** - to send emails to our customers e.g. via MailChimp
- **SMS broadcasting companies** - to send SMS and text messages to our customers
- **Mailing houses** - To send products and benefits to our customers that are not directly produced by BWSW (e.g. catalogues and other publications)
- **Market research companies** - to undertake research of our own customers

- **Social media companies (e.g. Facebook/Twitter)** - to verify your identity when you register on our web site using any available 'register with' functions and to provide you with relevant social media posts
- **Online learning hosting companies** - to enable our customers to take part in online training and learning e.g. anti-doping and safeguarding
- **Governing body committees** - to assist in event management, disciplinary issues and maintenance of competition licences
- **BWSW registered event organisers and officials** - to enable event organisers, coaches and officials to manage BWSW registered activities and communicate with participants
- **BWSW affiliated club officials and activity leaders** - to enable clubs and activity leaders to communicate with and administer activities for those belonging to their club or group
- **Home country associated federations (Waterski & Wakeboard Scotland)** - to manage events, activities, clubs, groups, volunteers and participants registered through BWSW's systems
- **Sports results agencies / third parties** - to collate results and reports for the BWSW website on behalf of BWSW

International transfer of personal data

We do not envisage transferring any information about or relating to individuals to anyone who is located outside of the European Economic Area.

In the event that personal data is shared with an organisation outside of the European Economic Area, we will ensure that we create and maintain appropriate safeguards with those organisations so that your personal data is subject to the same standards and protections as when we are processing your personal data inside the European Economic Area.

Data retention period

We will hold personal data in our data systems only for as long as we need it for the above-mentioned purposes for which we collected it. 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.

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

In addition to the above we may use third party cookies and pixels to advertise BWSW and our products / services across the internet (for example via Google AdWords Remarketing and other services). You may refuse to accept cookies by activating the

setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our website.

Please note that our third party advertisers may also use cookies, over which we have no control.

In addition to cookies, BWSW records the activity of users signed in to our websites in order to help us improve your customer experience and provide you with support.

The data subject's rights

You have the right to request access and further information concerning the processing of your personal data. The rights available to you are summarised below:

- **Right of access** - You have the right to obtain a copy of information we hold about you.
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of rectification and erasure extends to anyone we have disclosed your personal data to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.
- **Right to restriction of processing** - You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- **Right to Portability** - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- **Right to Object** - You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- **Right to Withdraw Consent** – where your personal data is processed on the basis of consent, you have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.

- **Right of Complaint** - You also have the right to lodge a complaint about any aspect of how we are handling your data with the *UK Information Commissioner's Office*, which can be contacted at www.ico.org.uk. We would, however, appreciate the opportunity to resolve your concerns with you in the first instance before a formal complaint is placed with the ICO.
- **Right to Opt-out of Marketing Communications** - You have the right to opt-out of marketing communications we send to you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided below.

Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by date-stamped communication.

How to contact us

If you wish to contact us about your personal data or exercise any of the rights described above please contact:

The British Water Ski & Wakeboard Federation Limited
Unit 3 The Forum
Hanworth Lane
Chertsey
KT16 9JX

Tel: 01932 560007

Email: info@bwsf.co.uk

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