



ASF & ASWC Privacy Notice

The Andrew Simpson Foundation (ASF) & The Andrew Simpson Watersports Centre (ASWC) are committed to protecting your personal information and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information and not do anything with your information that you wouldn't reasonably expect.

This Policy explains:

- how the ASF & ASWC's may obtain your personal information
- what information we collect
- how we will use that information
- who we share your information with
- your choices regarding your information we hold
- how we keep your information secure
- and how we use cookies to provide services to you or to improve your use of our websites.

This policy is written in accordance with the General Data Protection Regulation.

If you have any questions about it this Privacy Policy, you can either write to our Data Protection Compliance Officer at the Andrew Simpson Foundation, Lindsay Frost, WPNSA, Osprey Quay, Portland, Dorset DT5 1SA, email lindsay@andrewsimpsonfoundation.com or telephone 01305 457077.

How do we obtain your personal information?

We collect information in the following ways:

When you give it to us directly:

You may give us your information in order to sign up for one of our courses or events, when you contact us to ask about our activities, order products and services from us, seek assistance, (e.g. by emailing for information on Funding & Grants), make a donation to us, fundraise on our behalf, or otherwise give us personal information.

When you give permission to other parties to share it with us:

Your information may be shared with us by independent event organisers, for example the London Marathon or fundraising sites like Just Giving / BT My Donate / CAF Donate or Virgin Money Giving. These independent third parties will only do so when you have indicated that you wish to support the ASF with your consent.

You should always check these organisations' Privacy Notices when you provide your information to understand how they will process your information and how they may pass it on to others. We may also obtain information about you from a family member or a friend who contacts us on your behalf or if a fundraiser passes on your details to us.

When your information is available publicly or from other external sources:

We may combine information that we already have about you with information available publicly or information available from external sources in order to gain a better understanding of you and to improve our fundraising methods, products and services.



The information we get from other external sources may depend on your privacy settings or the responses you give, so you should regularly check them. For example, you may have provided permission for a company or other organisation to share your data with third parties including charities. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

When you use any of our websites

The ASF & ASWC's uses cookies to give you a more personalised web service.

Please see below section on how and why we use cookies.

What information do we collect?

We collect the following personal information:

For those signing up to courses

- Name and contact details
- Date of Birth (to ensure you are old enough)
- Relevant Medical Information or details of disabilities*
- Details of your Next of Kin

For those who sign up to our newsletter/Request information about our activities, services or products/Request fundraising information/Fundraise on our behalf:

- Name and contact details

Those who make donations directly to us:

- Name and Contact details
- Payment details

Those applying for raffles or competitions:

- Name and contact details

***Special Category Data (formally known as sensitive personal data):**

By definition special category data is data that is more sensitive and so needs more protection. When you sign on to a course with us we will collect information about your health, any medical conditions or disabilities which is considered special category data under GDPR. We process this specific data in order to manage and fulfil our health & safety duties towards you and the legal condition we rely on to do so is Article 9 (2b), "processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of...social protection law".



How do we use your information?

We will use your information in the ways set out below:

Those signing up to our courses:

- ✓ We use your information to communicate about the course details and manage our relationship as Service provider/service user
- ✓ To deliver our obligations under the contract to provide you with the services/course
- ✓ To manage our health & safety obligations
- ✓ We use your personal information look into, and respond to, complaints, legal claims or other issues if and when required.
- ✓ We use personal data to carry out statistical analysis and research in order to help us to understand how we are performing and how we can improve our services and meet the needs of people that require our help.
- ✓ We may also use your personal information for other purposes which we specifically notify you about and, where appropriate, obtain your consent.

For those who sign up to our newsletter/Request information about our activities, services or products/Request fundraising information/Fundraise on our behalf:

- ✓ We use your personal information to give you the information, support, services, or products you ask for.
- ✓ We use your information to gain a full understanding of your situation, so we can develop and offer you the best possible personalised services.
- ✓ We use your information to keep a record of your relationship with us and for internal administrative purposes (such as our accounting and course records), and to let you know about changes to our services or policies.
- ✓ We use your personal information look into, and respond to, complaints, legal claims or other issues.
- ✓ We use personal data to carry out statistical analysis and research in order to help us to understand how we are performing and how we can improve our services and meet the needs of people that require our help.
- ✓ We may also use your personal information for other purposes which we specifically notify you about and, where appropriate, obtain your consent.

Those who make donations directly to us:

- ✓ To administer the donations, you make to us and communicate with you about the donation(s)
- ✓ To claim Gift Aid on your donations.
- ✓ We use personal data to carry out statistical analysis and research in order to help us to understand how we are performing and how we can improve our services and meet the needs of people that require our help.
- ✓ We may also use your personal information for other purposes which we specifically notify you about and, where appropriate, obtain your consent.

Those entering competitions and raffles:

- ✓ We use your personal information to contact you about the outcome of the raffle or competition in the event that you are a winner.
- ✓ We may also use your personal information for other purposes which we specifically notify you about and, where appropriate, obtain your consent.



Our legal basis for processing your data

We rely on the following legal basis for processing your data:

<p>For those signing up to courses</p>	<p>Either Processing is necessary for the performance of a contract: We are legally entitled to process your data as we have a contract with you to provide the course/service and we need to process your personal data to comply with our obligations under that contract and associated health & safety obligations. OR Processing is necessary for the purposes of the legitimate interests pursued by ASSF: Where we have offered you a course as a prize and therefore you have not entered into a contract with us, we are legally entitled to process your data as we have a legitimate interest to provide the course/service and we need to process your personal data to comply with our obligations under health & safety obligations.</p>
<p>For those who sign up to our newsletter/Request information about our activities, services or products/Request fundraising information/Fundraise on our behalf:</p>	<p>Consent: With your consent, we may use your information to send you communications about our work and how you can help us, for example, information about our campaigns, volunteering and fundraising activities and how you can donate to us. Occasionally, we may include information from partner organisations or organisations who support us in these communications. Our forms have clear marketing preference questions and we include information on how you can say no to such marketing. You can let us know if you would prefer not to receive these communications at any time by writing to our Data Protection Compliance Officer at the Andrew Simpson Foundation, Lindsay Frost, WPNSA, Osprey Quay, Portland, Dorset DT5 1SA, email lindsay@andrewsimpsonfoundation.com or telephone 01305 457077.</p>
<p>Those who make donations directly to us</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by ASSF: When you indicate that you wish to make a donation to ASSF, we are legally entitled to process your data as we have a legitimate interest to administer your donation to us.</p>
<p>Those applying for competitions and raffles:</p>	<p>Consent: as above</p>



Who do we share your information with?

We will not sell or rent your details to any third parties. We will not share your information with third parties for marketing purposes.

Third Party partners working on our behalf:

We may pass/allow access to your information to our third-party service providers, agents, subcontractors and other associated organisations (including our wholly owned subsidiaries) for the purposes of completing tasks and providing services to you on our behalf (for example to send you the requested mailings and to deliver our services/courses). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

External data storage sites - We may store your data on servers provided by third party hosting vendors with whom we have contracted.

Necessary transfer to protect our legitimate business interests:

On rare occasions we may need to disclose or share your personal data with third parties for the purposes of fraud or credit risk reduction, in order to obtain advice and protect our legal rights, in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, of data subjects. We may share your information with the emergency services if we think there is a risk of serious harm or abuse to you or someone else. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Notice.

If you use our services (for example send/receive email to/from us) while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Keeping your data secure

Providing information over the internet

When we collect your personal information, we use strict procedures and security features to prevent unauthorised access. However, no data transmission over the Internet is 100% secure. As a result, while we try to protect your personal information, the Andrew Simpson Foundation & the Andrew Simpson Watersports Centres cannot guarantee the security of any information during transit that you transmit to us and you do so at your own risk.



Keeping your data secure

Once we have obtained your data we use a combination of secure web-based and software operating systems to protect and back up our data. We have a full set of security arrangements in place reinforced by appropriate and regular training of staff. Full details of our data protection procedures and security measures are found within our Data Protection Framework which includes our Data Protection Policy and GDPR User Manual. These are available by emailing lindsay@andrewsimpsonfoundation.com

External website links

The ASF & ASWC website may include links to other sites, not owned or managed by us. We cannot be held responsible for the privacy of information collected by websites not managed by us. We advise you to read the Privacy Notice on any external website that you visit.

How do we use cookies?

The ASF & ASWC's uses cookies to give you a more personalised web service.

What are cookies?

Cookies are small text files placed on your computer by websites you visit. They are widely used to make websites work more efficiently for visitors, and to provide information to the owners of the site. Some of the cookies we use are essential in order for parts of the website to operate.

How do we use cookies on the website?

We use cookies on the website for our own internal purposes, to track how users navigate through the website. This helps us to evaluate and improve website and our online services. We use information derived from cookies in order to:

- ✓ compile statistics on how our website is being used, which can help us to improve our website and online services.
- ✓ facilitate users' ability to navigate through the website.
- ✓ ascertain whether the website is operating effectively.
- ✓ personalise and improve the service we offer you by understanding your preferences and establishing which areas of the website are most relevant to you.

We also use cookie technology with our online registration forms to ensure we maintain your confidentiality and security as you move through secure or password protected areas of our websites.

Third party cookies

We also use third party advertising companies to serve ads when you visit our website. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisement about goods and services that may be of interest to you.

Managing cookies

In your web browser you can control which types of cookies you allow. You can turn cookies on or off using your browser's settings. You can also delete cookies and clear your browser's cache (history).



Privacy and our Online Community

Our Online Community is moderated and we do not display the full names of individuals nor addresses. When you post personal information on a discussion board on our Online Community or other messaging board on our websites, your information is publicly accessible. Such information can be viewed online and collected by third parties. We are not responsible for the use of information by such third parties.

When contributing to a discussion we strongly recommend you avoid sharing any personal information that can be used to identify you (such as your name, age, address, name of employer). We are not responsible for the privacy of any identifiable information that you post in our Online Community or other public pages of our websites.

If you're 16 or under

If you're aged 16 or under, you must get your parent/guardian's permission before you provide any personal information on our websites.

Dealing with people in vulnerable circumstances

We are committed to protecting vulnerable supporters as well as protecting the interests of people in vulnerable circumstances when fundraising for us. Please contact lindsay@andrewsimpsonfoundation.org and ask for the ASF & ASWC Safeguarding & Child Protection Policy.

Accessing and updating your personal information

You can request access to any information we hold about you by contacting our Data Protection Compliance Officer at the ASF, WPNSA, Osprey Quay, Portland, Dorset DT5 1SA, email lindsay@andrewsimpsonfoundation.org or telephone 01305 457 077.

Equally, please let us know of any changes to your personal information.

You can also let us know if you would no longer like to receive fundraising communications from us or if you would prefer us not to profile you for the purposes of targeting or tailoring our fundraising efforts, by using the contact details above.

Changes to this policy

We may change our privacy policy from time to time so please check back periodically.

This Privacy Policy was last updated 23rd May 2018