

Portsmouth Services Fly Fishing Association – Data Privacy Statement

1	What is this document?	<p>The Portsmouth Services Fly Fishing Association ('The Association') is committed to safeguarding your privacy. We want you to know how we collect, use, share, and keep information about you and the choices that are available to you as a member when you use our membership services.</p> <p>In this privacy statement, we describe how the Association, in its capacity as a data controller and data processor, collects, uses, shares, and keeps information about you in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the General Data Protection Regulation).</p>
2	Information collected	<p>We collect Personal Information about you from:</p> <ul style="list-style-type: none"> • your membership application form and other documents you provide to us; • beat bookings you make for yourself and any guests for fishing or when you request or utilise any member services (e.g. renewals, picnic ticket purchases); • catch returns you submit on completion of fishing; • you, through the way you communicate with us and use your membership (e.g., telephone numbers provided during calls to Association Officers, any research or surveys in which you participate or to which you respond). <p>This Personal Information includes:</p> <ul style="list-style-type: none"> • Name • Rank/Title • Date of Birth • Postal Address • Telephone Numbers (Landline and/or Mobile) • Email address • PSFFA membership details • Family Membership details • Details of financial transactions with the Association
3	Use of Information	<p>We use your Personal Information:</p> <ul style="list-style-type: none"> • where it is necessary for the performance of a contract or compliance with a legal obligation (e.g. maintenance of Association financial accounts); • for our legitimate interests, such as to facilitate the efficient running of the Association as a membership organisation; • To compile and maintain annual catch and stocking returns; or • where we have obtained your consent, such as for providing membership benefits with 3rd party providers. <p>More specifically, we use your Personal Information to do the following:</p> <ul style="list-style-type: none"> • administer and manage your membership; • communicate with you through email, SMS or any other electronic methods about your membership; • communicate Association news and information on any membership offers to you (by mail, e-mail, telephone, SMS, via the internet or using other electronic means) principally via an electronic newsletter; • allow you to give feedback and to permit us to respond

		<p>appropriately</p> <ul style="list-style-type: none"> • conduct research and analysis to allow us to maintain records, provide reports to riparian owners and to support and monitor our environmental objectives; • produce data analytics, statistical research, and reports on an aggregated basis; • conduct testing (to ensure security and when we update our systems), data processing, website administration and information technology system support and development.
4	Security of information	<p>Only the Honorary Secretary, Membership Secretary and Treasurer will be able to access your full details. The Water Manager, Environmental Officer, Risk Management Officer and the Recorder may hold limited details applicable to their roles with the consent of the individual members concerned (e.g. river keeper’s email addresses).</p> <p>System admin staff appointed by The Committee, who are responsible for the technical upkeep of the Website and Beat Booking System, have access to the data held for maintenance purposes only as described in section 3.</p> <p>We use organisational, administrative, technical and physical security measures to safeguard your Personal Information and to help ensure that your information is processed promptly and accurately. Specifically:</p> <ul style="list-style-type: none"> • A membership list showing name, rod number and telephone number is maintained on a members-only area of the Association website access to which is user name and password protected it is a condition of membership that members won’t pass or sell the data on to anyone else and will only use the data for club related communication; • Association Officers use personal IT devices to maintain and store information applicable to their roles, access to these devices is password protected and adequate anti-virus software is installed; • files containing members’ Personal Information will be individually password protected. • When using electronic communications with a membership-wide distribution appropriate measures will be taken to withhold member’s email addresses by use of a mailshot application or the “Bcc” facility. To facilitate Association business, committee members are deemed to have agreed to their email addresses being visible on emails requiring group discussion.
5	Information sharing	<p>We will share your Personal Information only with your consent or as required or permitted by applicable law, such as with:</p> <ul style="list-style-type: none"> • the Services Manor Fishery Limited (SMF) and the Services Hockley Fishery Limited (SHF) as required to facilitate the transfer of shares in those companies; • with other members via a membership list showing rod number, name and telephone number on a members-only area of the Association website; • selected third parties who offer either reciprocal facilities or other benefits for example: <ul style="list-style-type: none"> ○ The Naval Club – Name and Rod Number ○ Romsey Tackle – Name only
6	Retention of	We will keep your Personal Information only for as long as we need to

	Information	<p>support your membership, unless we are required to keep it for longer periods. Specifically:</p> <ul style="list-style-type: none"> • your Personal Information that forms part of the Association’s financial records may be stored by us for 7 years after you end your membership, due to Inland Revenue requirements; • if you elect not to take a rod in any year you will be transferred to the Dormant List under the terms of your membership where your last given contact details will be maintained until you decide otherwise; • when you terminate your membership and your Personal Information is no longer necessary for legal or regulatory needs, we will take reasonable steps to destroy such information securely.
7	Access to your Information	<p>The Association encourages you to check regularly that all Personal Information held by us is accurate and up to date. If you believe that any information we hold about you is incorrect or incomplete, you may ask us to correct or remove this information from our records.</p> <p>Any information which is found to be incorrect or incomplete will be corrected promptly.</p>
8	Your rights	<p>You have the right to access, update, erase, change or correct your Personal Information. More specifically, you have the right to:</p> <ul style="list-style-type: none"> • withdraw your consent for our use of your Personal Information at any time, where our processing is based on your consent; • restrict and/or object to the use of your Personal Information; • request a copy of your Personal Information we have about you. <p>If you have questions about this privacy statement or how your information is handled or wish to make a complaint or exercise your rights, please contact the Honorary Secretary (Treasurer@psffa.org) in the first instance.</p>
9	Data Protection roles	<p>Under the GDPR, a Data Protection Officer (DPO) must be appointed if:</p> <ul style="list-style-type: none"> • you are a public authority (except for courts acting in their judicial capacity); • your core activities require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); <p>or</p> <ul style="list-style-type: none"> • your core activities consist of large scale processing of special categories of data or data relating to criminal convictions and offences. <p>The Association does not conduct such activities, nor does it collect or use Sensitive Information. A DPO has not therefore been appointed. For enquiries relating to information management within the Association, please see section 8.</p>