

Data Protection and Privacy Policy

University of Malta Rowing Club

Last updated:	1 st March 2022
---------------	----------------------------

Introduction and General Provisions

The University of Malta Rowing Club is committed to protecting the privacy and protection of data of our clients, customers, partners, employees and all other persons in respect to whom personal data has been collected. (hereinafter the “*Data Subjects*”). The University of Malta Rowing Club will only collect personal data in a lawful, fair and transparent manner, limited to the purposes for which it has been collected, keep accurate and up-to-date as much as possible, whilst ensuring secure storage, integrity and confidentiality of the personal data collected.

All data is collected and processed in accordance with the General Data Protection Regulation (EU) 2016/679 (“*GDPR*”), Data Protection Act 2001 (the “*Act*”) and other subsidiary legislation (collectively referred to as “*Data Protection Laws*”).

What is the purpose of this Data Protection Policy (the “Policy”)?

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as;
- Where we obtain the data from;
- What we do with that data;

-
- How we store the data;
 - Who we transfer/disclose that data to;
 - How we deal with your data protection rights;
 - And how we comply with the data protection rules.
 - All personal data is collected and processed in accordance with the Data Protection Laws.

Data Controller

The University of Malta Rowing Club (referred to as “we”, “us”, “our” or the “Organisation” in this policy) in this policy is the name which is collectively administered by the University of Malta Rowing Club (VO-1358) of KSU Office, Student House, University of Malt, Msida, MSD2080 are the “data controller” of all personal information that is collected and used about the University of Malta rowing club members for the purposes of the Data Protection Laws.

What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and certain health information. We may collect personal data from you through our physical forms, through our website (<https://umrowingclub.org/>) (the “Website”), through our contracts, any other designated or specific form..

Specifically, we may collect the following categories of information:

1. Name, home address, e-mail address, telephone number, passport or other recognized personal ID card numbers and details;
-

-
2. Data concerning health which we will process exclusively for (a) the protection of our data subjects' vital interests (in the case of medical emergency and security) or (b) where specific consent has been provided;
 3. Information about your use of our Website; and
 4. The communications you exchange with us or direct to us via letters, emails, calls, completion of University of Malta Rowing Club forms and social media.

Uses of personal data

Your data may be used for the following purposes:

1. Performing our contractual obligations in your favour;
 2. Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to your membership at the University of Malta Rowing Club;
 3. We use your payment information for accounting, billing, payment of salaries and audit purposes and to detect and / or prevent any fraudulent activities;
 4. Administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, membership surveys, maintenance and development, or in order to deal with a dispute or claim.
 5. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;
 6. Membership Services communications: we use your data to manage our relationship with you as our member and to improve our services and enhance your experience with us; and
-

-
7. Provide tailored services: we use your data to provide information we believe is of interest to you and to personalise the services we offer to you, such as our training program.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for. In most cases, we will need to process your personal data so we can fulfil our contractual obligations with you.

We may also process your personal data for one or more of the following purposes:

- To comply with a legal obligation;
- You have consented to us using your personal data;
- To protect your vital interests or those of another person (e.g. medical emergency).

Only members aged 18 or over can provide their own consent. For children under this age, consent of the children's parents or legal guardians is required.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means. We must also consider periods for which we might need to retain personal data in order to meet our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of a claim being made.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal

data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

Security

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction, breach or damage.

Sharing of Personal Data

We will not share your personal data with any third parties, unless such sharing is required by law or expressly consented by you.

Cookies Policy

The Website site uses cookies to enable us to improve our service to you and to provide certain features that you may find useful. This may include cookies of media and advertising partners that are being placed on your machine when visiting our Website. Please visit our partners' websites for information on their privacy and cookie policy.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognise your browser and help us to track visitors to our site; thus enabling us to better understand the products and services that will be most suitable to you. A cookie contains your contact information and information to allow us to identify your computer. Most Web browsers automatically accept cookies, but, if you wish, you can change these browser settings by accepting, rejecting and deleting cookies. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to change these settings, you may find that certain functions and

features will not work as intended. The cookies we use do not detect any information stored on your computers.

For more information about cookies and how to stop cookies being installed visit the following website:
<http://www.allaboutcookies.org>.

Data Protection Contact Person

The University of Malta Rowing Club does not fulfil the requirements for the appointment of a Data Protection Officer as contemplated by Article 37(1) of the GDPR. In order to comply with the spirit of the Data Protection Laws, the Organisation has designated Mr. Luke Frendo as the Organisation's Data Protection Contact Person. Any notification to be sent under this Policy to the Organisation shall be sent to Mr. Luke Frendo on the following email address:

umr@umrowingclub.org

Your data protection rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
 - **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also
-

have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically usable format and to be able to transfer your data to another party in an electronically usable format.
- **Withdraw consent.** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, then please submit a notification in writing to the Organisation’s Data Protection Contact Person as set out above. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Changes to Data Protection Policy

This Policy may change from time to time and any changes thereto will be communicated to you by way of a notice on the Website.

Vers. dated 1 March 2022
