



AURORA SEA SCHOOL PRIVACY POLICY

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your training with us. This notice applies to you if you have registered to take part in a course run by the Aurora Sea School. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to the **Aurora Sea School**.

1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of course you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- Personal contact details that allow us to contact you directly such as name, title, email addresses and telephone numbers
- Date of birth
- Gender
- Course start and end date
- Any relevant qualifications and experience
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us
- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you
- Records of your attendance at any courses hosted by us
- Images in video and/or photographic form;
- Details of emergency contacts
- Any disciplinary and grievance information
- Any special dietary requirements for meals/events etc.

2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- Information about your health, including any medical condition.

In relation to the special category personal data that we do process we do so on the basis that

- The processing is necessary for reasons of safety and wellbeing.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent (i.e. applications to the DBS for those in roles involving minors).

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about you when you apply to attend a course at our sea school.

We also may collect personal information if you request information about future courses or bespoke training.

If you are providing us with details of emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer your course attendance and manage our relationship with you, including dealing with payments and any enquiries made by you.	All contact and customer details, transaction and payment information.	This is necessary to enable us to properly manage and administer your training with us.
To send you other information we think you might find useful or which you have requested from us, including our newsletters, information about future courses and events.	Contact details.	Where you have given us your explicit consent to do so.
To answer your queries or complaints.	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records.	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your training and run our sea school. In some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category

		<p>reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
For the purposes of promoting the sea school and our courses.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements.	Records of attendance and medical information about your health.	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To administer your attendance at any courses or programmes you sign up to.	All contact and customer details, transaction and payment data.	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.
To arrange for any trip or transportation to and from an event.	Details of emergency contacts, transaction and payment information, health and medical information.	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our facilities.	Health and medical information.	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To gather evidence for possible grievance or disciplinary	All the personal information we collect.	We have a legitimate interest in doing so to provide a safe and fair environment for

hearings.		<p>all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements.</p>	<p>Information about your criminal convictions and offences.</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with this. If you do not provide us with the requested personal information we may not be able to admit you to attend our courses or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to cancel a course you already booked on. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain course benefits to you.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you**
- **Any governing bodies or regional bodies for the courses covered by our sea school:** to allow them to properly administer the training on a local, regional and national level

- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

6. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of six years after your last contact with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you by emailing us at dawn@rowaurora.co.uk. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

7. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used
- The right to access the personal information we hold about you
- The right to request the correction of inaccurate personal information we hold about you
- The right to request the erasure of your personal information in certain limited circumstances
- The right to restrict processing of your personal information where certain requirements are met
- The right to object to the processing of your personal information
- The right to request that we transfer elements of your data either to you or another service provider
- The right to object to certain automated decision-making processes using your personal information.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

8. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

9. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email Dawn@rowaurora.co.uk or write to us at Dawn Wood, Aurora Sea School, Sea end house, Burnham on Crouch, Essex, CM0 8AN

Version dated 25th May 2023