

Hawks Privacy Statement February 2025

The Hawks' Club maintains a database of members in order to stay in touch with our community and keep you updated about news, events, and fundraising activities. We may also contact you on those rare occasions when we need to ascertain your views on an issue affecting the Club, for which the Club Rules require such action.

The same database is also used by the Hawks' Company Limited (the Company – HCL) and the Hawks and Ospreys Charitable Trust (the Charity – HOCT) for their respective purposes in respect of Club members.

This privacy statement covers all three bodies. Terms such as 'we' and 'our' includes all or some of the three bodies as appropriate.

We collect and store personal information (or "data") about all our members, the bulk of which is recorded when you are elected. We are committed to protecting and respecting your privacy and this Policy sets out what information we collect about you, where and how we use ("process") it. We may update your data when we receive information that affects your record. You may update your own data via the portal on our website.

We may change this Policy from time to time. If we make any significant changes, we will advertise this on the website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information, please contact the Club Steward who is the Data Protection Contact (steward@hawksclub.co.uk).

For the purposes of current and future legislation covering data protection in United Kingdom, the Data Controller is The Hawks' Club.

What type of personal information we collect

The information we have about you depends on where we collect it, but may include:

- Name and address and other contact details (email, phone number, etc)
- Consent options and communication preferences
- Details of your school and college affiliation and sports played
- Details of sporting achievement / aspirations and appropriate limited financial information required when applying for a HOCT Award. Bank details are included for successful applicants only,
- A record of payments made, whether via the website or by other means, which could include event tickets, merchandise purchases or donations. We do not store your credit/ debit card or bank details as these are processed securely externally by a third-party payment provider.

Where we collect information from

We collect personal information when you:

- are elected;
- login via the website;
- update your online profile;
- take part in an event;
- attend a meeting with us and provide us with information;
- contact us in any way including online, email, phone, SMS, social media or post;
- apply for a HOCT Award.

How we use your information

We will use your personal information in a number of ways, always with a legal basis for processing your data. These may include:

- providing you with the information or updates that you have asked for;
- sending you communications (with your consent if required) that may be of interest, including invites to events, newsletters and fundraising campaigns;
- delivering our obligations under any contract between us;
- seeking your views on the services or activities we carry out, so that we can make improvements;
- operating a database of Hawks Club members, updating our database records and ensuring we know how you prefer to be contacted;
- analysing your engagement with our website and other content to help us improve our services for you;
- running our mentoring programme/ club activities/ reunion events/ sports fixtures;
- assessing applications for HOCT awards and in making the awards

Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- you have given us your consent for the information to be used;
- it is necessary for us to hold and use your information to carry out our obligations under a contract entered into with you;
- it is necessary for our legitimate interests to hold and use your information and we are not impacting your privacy by doing so.

Updating your consent preferences

If you have an online profile on our website, you can update your consent options by clicking on “Members Login”. Scroll down to find your ‘Contact preferences’ where you will see a list of consents. Click on “Edit Contact details” to change any of these.

Please note that your name (but not full profile) may appear in various places around the community website, such as in ‘Search’ results irrespective of the privacy settings you have selected.

If we are using consent as our legal basis for processing your data, we must have an explicit “opt-in” from you for this specific type of processing.

If we are using legitimate interests as our legal basis for processing your data, we will process your data responsibly in a way that you would reasonably expect, and you can opt-out at any stage.

If you want to contact us about your consent preferences, please contact the Club Steward by email [steward@hawksclub.co.uk].

How we keep your information safe

We understand the importance of keeping your personal information secure and take appropriate steps to safeguard it.

Your data is stored on a dedicated, secure cloud server hosted by Salesforce and managed by our website provider, Granite5. Industry standard firewalls, anti-virus, encryption and back-up methods are in place, as well as strict data handling protocols.

We always ensure only authorised persons have access to your information, which means only our approved volunteers, employees, contractors, directors and trustees, and that everyone who has access is appropriately trained in data management.

If you use your login in this website, you are responsible for keeping your login details (email and password) confidential and we ask that you do not share your password with anyone.

No data transmission over the internet can be guaranteed to be completely secure. So, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online, and you do this at your own risk.

Who has access to your information?

Third parties who provide services for us, for example Granite5. We select our third-party service providers with care. We provide these third parties with the information that is necessary to provide the service, and we will have an agreement in place that requires them to operate with the same care over data protection as we do

Third parties: if we run an event in conjunction with them. We will let you know how your data is used when you register for any event

Web hosting, email hosting, analytics and search engine providers that enable us to run our community database and improve our website and its use

Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another organisation. In such event, we will take steps to ensure your privacy rights will be protected by the third party

We may transfer contact details of our members who live outside the EU to other members wishing to organise a Club event within their area.

Other than this, we will not share your information with other organisations without your consent.

Keeping your information up to date

Please would you let us know if your contact details change. Online members can update your details directly by logging-in to the website and clicking on 'Members Login'. You can also update your details by contacting us at steward@hawksclub.co.uk.

Use of aggregated data

Where data can be aggregated and anonymised, our website provider (Granite5) might use this for research purposes without restriction. For example, they may monitor traffic patterns, site usage, response rates and data trends to help make improvement to the website software. They are entitled to do this because the resulting data will not personally identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

How long we keep your information for

On the basis that "once a Hawk, always a Hawk" we will hold your personal information for life.

Where we rely on your consent to contact you for direct email marketing/ fundraising purposes, we will treat your consent as lasting for as long as we continue to receive a donation from you.

If you ask us to stop contacting you, we will keep a record of your contact details and limited information needed to ensure we comply with your request. If you ask us to remove your personal data from our database, we will delete all the information we hold apart from your name and the dates that you attended The Hawks' Club and archive your record in our database.

Your rights

You have the right to request details of how we use your personal information through making a subject access request. Such requests must be made in writing by contacting the Club Steward (steward@hawksclub.co.uk).

You also have the following rights:

- to request rectification of information that is inaccurate or out of date;
- to erasure of your information (the “right to be forgotten”);
- to restrict the way in which we are dealing with and using your information;
- to request that your information be provided to you in a format that is secure and suitable for re-use (the “right to portability”);
- in relation to automated decision making and profiling.

All of these rights are subject to certain safeguards and limits or exemptions. To exercise any of these rights, you should contact the Club Steward at the above email address.

If an individual believes that The Hawks’ Club, HCL or HOCT has not complied with this policy or acted otherwise than in accordance with Data Protection Laws, please contact The Hawks’ Club immediately.

If you feel your complaint has not been addressed satisfactorily, you can also make a referral to or lodge a complaint with the Information Commissioner’s Office (ICO): <https://ico.org.uk>.

This Policy was last updated in 14 February 2025