



# Canal & River Trust

Making life better by water

## Privacy Schedule for Customers

This schedule sets out the details of our processing of personal information of our customers, including boat licence customers, business boating customers, customers of Waterside Mooring, angling customers, event attendees, tenants to our properties, suppliers, museum visitors, and retail and attraction customers.

It is important that you read this section of our privacy schedule together with the main section of our [privacy policy](#). This is so that you are fully aware of how your information is used and your individual rights.

### What Information We Collect About You

Depending on the circumstances, we may hold some or all of the following about you:

- Your name
- Your contact details
- Payment information (such as credit card and bank details)
- How you would like to hear from us
- Details relating to your boat (e.g. dimensions, index number, insurance, boat safety, qualification for relevant discount etc)
- Details relating to your home mooring (for boaters with a home mooring)
- Your boat movements
- Details of Angling Club
- Information relating to your disability or other protected characteristics under the Equality Act 2010 (where we are considering reasonable adjustments under our Equality Act Policy for Customer Services)
- Information you provide to us through any customer survey (including Boating Customer Survey)
- Your enquires, feedback, responses to surveys and consultations and details of individual complaints and other direct contact with the Trust
- Information in relation to events you book with us
- Information in relation to any legal or enforcement proceedings
- Information relating to any health and safety reports, including incidents and investigations, that you have reported or been involved with including medical or health conditions resulting from the incident
- Imagery/videos including CCTV and body worn camera footage

### How We Use Your Information

We collect information from your online or paper application form in order to be able to provide you with a boat licence, business boating agreement, mooring permit pre-booking to our museums and attractions or other goods or services from the Trust.

We also collect responses to surveys and consultations, electronic records of your contact with us such as telephone calls or report an accident or make a complaint.

We may also collect your information from a previous boat owner when you are the new owner of the boat and they have informed us of the boat transfer.

For boating and mooring customers, we need to do this so we can provide you with a boat license or a mooring permit and communicate with you on boating related matters such as stoppages and incidents. If you choose not to provide this information, then we would not be able to provide you with a license or mooring permit. If you have given consent and signed up to our boaters update you will receive more general boating news and updates.

Unless otherwise specified below, we delete this personal information 7 years after the end of the relevant boat license, business boating agreement, mooring permit or other agreement.

For boating and mooring customers, we ask for information about the status of insurance for your vessel and we may, where reasonably justified, contact your insurance company to confirm and verify the nature and scope of your insurance. While we don't carry out checks in every case, since we can refuse a licence or certificate if there is no insurance in place for a vessel, it is important that we are able to carry out checks where we consider this to be necessary.

We collect boat sighting information, and this is used to evidence boating navigation patterns to ensure that licensing conditions are complied with, we will hold this data for legal and enforcement proceedings as required. We delete this information after 3 years from the end of the relevant license period.

Where necessary we will also process personal data of boaters and retain details of interactions as part of any accident, incident or any enforcement action when either licensing conditions or mooring terms and conditions have not been complied with. We delete this information after 7 years from the conclusion of any investigation into the accident or incident or the conclusion of any enforcement action.

Your information may be used for contacting you regarding consultative processes or to update you on amendments to Terms and Conditions or contractual information.

For museums and attractions, we collect information to provide the service, product or essential information you expect from us. Where you have given us your consent to do so, to keep you informed about visiting our places, volunteering with us, membership, events, conservation work, fundraising, and shops.

We collect information about suppliers as part of our tender process which may include personal information if you are a sole trader. Your data will only be used for the purpose of completing the tender process. We delete this information after 12 months from the conclusion of a tender process or 7 years from the date of a transaction.

For other customers we delete your personal information after 7 years from the date of our transaction or, if later, the resolution of your enquiry or complaint.

## **Legal Basis for Processing Personal Information**

As our boat licensing activity is a public task, the Trust relies on this as a legal basis for processing this personal data in many circumstances. Otherwise, we rely on legitimate interests e.g. to share information where necessary in connection with accidents or incidents, or for identifying new ownership of vessels.

For boaters for whom we are making reasonable adjustments under our Equality Act Policy we collect (through our [Equalities Questionnaire](#)) particularly sensitive information (known as special category personal data) relating to your disability and other protected characteristics. We process this data with your explicit consent. We take additional security measures to restrict access to this information and we delete this information 7 years after the end of the period of reasonable adjustment.

For other customers, we need to collect information so that we can provide you with a service such as a mooring permit, business boating agreement, other goods or services that we have agreed to or to bring any complaint or enquiry to a resolution. If you do not provide this information, then we would not be able to provide you with these goods or services and we therefore rely on our contractual relationship with you for processing your personal data in these circumstances.

Retail sales, museums and attractions and events management. We process customer data to fulfil museums and attractions bookings and retail activities. Your data will be used to communicate with you throughout the process, including confirming we've received your order and payment, to confirm dispatch, to clarify where we might need more detail to fulfil an order or booking, or to resolve issues that might arise with your order or booking. Properties may also hold dietary requirements for weddings and events. When we have a contractual relationship with you, we may be required to send you information relating to your contract with us.

Where we do not have a contractual relationship with you as the customer e.g. angler/lets fish attendee we rely on the legitimate interest lawful basis to process your information. Where we rely on this lawful basis, we will conduct a legitimate interest assessment to demonstrate our grounds for relying on this basis.

We may also send you other content e.g. surveys where we have a legitimate interest to do so.

The Trust often uses Snap Surveys to gather information on our behalf, it will be clear if this is the case. You can [read their Privacy Policy here](#).

We rely on consent to send you content when you have signed up to our marketing newsletter, you are free to withdraw your consent for this at any time.

## **How We Share this Data**

As we need to share information with others to provide the services to you, there is a legitimate interest in the Trust sharing this information. We may also need to share it to meet contractual and legal obligations.

We share customer personal data with the following individuals and organisations:

- The Trust's external customer contact agent who manages our inbound calls, digital and email enquiries as well as processing licence and mooring payments through our online web-based platform.
- The Trusts external mailing service who manages our inbound and outbound mail, this could potentially include special category data.
- The Trust's legal advisors and external legal advisors, contractors, mooring providers, individuals or organisations with a legitimate interest or duty in exchanging information about you, for boating and mooring customers who are subject to enforcement action or in breach of mooring terms and conditions under the terms of our boat licence and/or mooring permit.
- The Environment Agency for Gold License boating customers.
- The Boat Safety Scheme (a jointly run initiative between the Trust, the Environment Agency and other navigation authorities), for boating customers.
- Police, local authorities and other law enforcement and regulatory and safeguarding agencies where we are satisfied that the relevant agency has demonstrated a proper legal basis for requesting personal information (e.g. prevention and detection of crime, apprehension and prosecution of offenders, administration of justice or collection of taxes) unless there is an overriding and urgent safeguarding concern where non-disclosure would harm the vital interest of any party when disclosure may take place without a request in writing.
- The Trust's subsidiaries and affiliated companies when we have a legitimate interest to share the data or are required to in order to fulfil the needs of our public task.

Last edited: July 2021