

# SOUTH CERNEY SAILING CLUB PRIVACY POLICY



Date: 03/10/2018

## 1. About this Policy

1.1 This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to regularly check our website <https://southcerneysailingclub.org.uk> our Club noticeboard for any amendments (but amendments will not be made retrospectively).

1.4 We will always aim to comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, the Club will be the “data controller” of all personal data we hold about you.

## 2. Who are we?

2.1 We are South Cerney Sailing Club. We can be contacted at Lake 16, Station Road, South Cerney, Glos GL7 5TH or [info@southcerneysailingclub.org.uk](mailto:info@southcerneysailingclub.org.uk) or 07071 223618.

2.2 We are a Club affiliated to the RYA, the governing body for all forms of boating in the UK.

## 3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es) and membership status	Managing the Member's membership of the Club. Managing the duty roster. Mailing of important club information	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependents	Managing the Member's and their dependents' membership of the Club and Child protection provision	Performing the Club's contract with the Member.

<p>Members Name and Telephone Numbers</p>	<p>For a Members Directory available to members only on the members only section of the clubs website.</p> <p>To providing fellow members with contact information.</p>	<p>Performing the Club's contract with the Member and Visitors.</p> <p>At the option of the member. This information can be modified or removed at any time by the member via their online account.</p>
<p>Emergency contact details</p>	<p>Contacting next of kin in the event of emergency.</p>	<p>Protecting the Member's vital interests and those of their dependents.</p> <p>At the option of the member. This information can be modified or removed at any time by the member via their online account.</p>
<p>The Member's name, boat class, boat name and sail number</p>	<p>Managing race entries and race results.</p> <p>Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.</p> <p>Allocating compound spaces.</p>	<p>For the purposes of our legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>For the purposes of our legitimate interests in operating the Club</p>
<p>Member's Training logs, qualifications and experience</p>	<p>To ensure adequate provision of support, in particular for Junior sailors and trainees.</p> <p>To ensure compatibility with Duty requirements.</p>	<p>Performing the Club's contract with the Member and Visitors.</p> <p>For the purposes of our legitimate interests in operating the Club.</p>

Name, Address, e-mail address, telephone number and qualification achieved by attendees of official RYA Sailing Courses. Information recorded and held indefinitely.	For the purpose of proof of qualification.  For reporting to the RYA	For the purposes of our legitimate interests in operating the Club.  For the purposes of the legitimate interests of the RYA
Name, Address, e-mail address, telephone number and qualification achieved by attendees of official RYA Powerboat Courses. Information recorded and held until completion of the course.	For the purpose of proof of qualification.  For reporting to the RYA	For the purposes of our legitimate interests in operating the Club.  For the purposes of the legitimate interests of the RYA
Name, Address, e-mail address, telephone number and qualification achieved by attendees of general courses. Information recorded and held as prescribed by the governing authority.	For the purpose of proof of qualification.  For reporting to the governing authority	For the purposes of our legitimate interests in operating the Club.  For the purposes of the legitimate interests of the governing authority
Member's or Visitors name, contact details and medical information.	To enable the management of RYA Training courses in line with RYA requirements	Performing the Club's contract with the Member and Visitors.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience and bank details	Managing instruction at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members and to make payments for services

<p>Photos and videos of Members or Visitors and their boats where the individual/s are not identified, these can be held in perpetuity</p>	<p>Posting on the Club's website and social media pages and using in press releases and for the promotion of the Club</p>	<p>Consent. We will seek the Member's consent on their membership application form and each membership renewal form.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p>
<p>Photos and videos of Members or Visitors and their boats where the individual/s are identified. These can be held in perpetuity.</p>	<p>Putting on the Club's website and social media pages and using in press releases for the promotion of the Club and for reporting event results</p>	<p>Consent. We will seek the Member's, or their guardians if under 18 years of age, consent at the time of taking the photo or video.</p> <p>Consent withdrawal: Photo's and video will be withdrawn from any data base in the Clubs control if consent is later withdrawn.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p>
<p>Bank account details of the member or other person making payment to the Club or being paid by the Club</p>	<p>Managing the Member's and their dependents' membership of the Club, the provision of services and events.</p>	<p>Performing the Club's contract with the Member. Held by the Club's nominated UK based bank and not in any Club database.</p>
<p>The Member's name and e-mail address, whilst a current member and for up to one year after ceasing to be a member of the Club</p>	<p>Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club. See paragraph 5.3 below.</p>	<p>For the purposes of our legitimate interests in operating the Club and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.</p>
<p>Name, e-mail address and telephone number of each Club Officer</p>	<p>Information published on Club's website, Club's handbook, in Club's newsletter and other publications, in the Club's marketing materials and made available to the RYA, in each case as a point of contact at the Club</p>	<p>For the purposes of our legitimate interests in operating and promoting the Club</p>

Name, e-mail address and telephone number of each Club committee member	Information published on Club's website and Club's handbook	For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers
Name, Address, e-mail address and telephone number of visitors for up to one year after visiting the Club	To comply with the Club's insurance requirements and awareness of who is or has been on site	For the purposes of our legitimate interests in operating the Club.
Name, Address, e-mail address, telephone number and boat information of visitors competing at Club events.	Managing race entries and race results.  For compliance with insurance requirements  Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.	For the purposes of our legitimate interests in operating and promotion of the Club.
Next of kin information of visitors competing at Club events. Held for the duration of the event.	Managing racing activities and support  For compliance with insurance requirements	For the purposes of our legitimate interests in operating the Club.
CCTV recorded information	For the ongoing security of the club	For the purposes of our legitimate interests in operating the Club.

#### 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.2 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.3 For any payments which we take from you online we will use a recognised online secure payment system.

4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **5. Who else has access to the information you provide us?**

- 5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.
- 5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.
- 5.3 We may also pass your personal data to the RYA for the purposes of carrying out surveys when it is in the legitimate interest of the club and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.

## **6. How long do we keep your information?**

- 6.1 Unless specifically indicated above we will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.
- 6.2 We securely destroy all financial information once we have used it and no longer need it.

## **7. Your rights**

7.1 You have rights under the GDPR:

- 7.1.1 to access your personal data
- 7.1.2 to be provided with information about how your personal data is processed
- 7.1.3 to have your personal data corrected
- 7.1.4 to have your personal data erased in certain circumstances
- 7.1.5 to object to or restrict how your personal data is processed
- 7.1.6 to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Commodore at [commodore@southcerneysailingclub.org.uk](mailto:commodore@southcerneysailingclub.org.uk)