

Established 1927



RYA Affiliated

## **Harwich & Dovercourt Sailing Club**

### **Data Protection Policy**

#### **1. About this policy**

- 1.1 This policy explains when and why we collect, use and store personal information about our members, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may need to make changes to this Data Privacy Policy from time to time. Any amendments will be ratified by the committee before the policy is updated and subsequently published via the website or the Club noticeboard. Amendments will not be made retrospectively.
- 1.3 We will always 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, we will be the "controller" of all personal data we hold about you.

#### **2. Your consent to this policy**

- 2.1 When you choose to become a member of the Club or partake in a Club activity and are required to provide personal data, we will endeavour to make it clear why it is needed.
- 2.2 If the information collected goes beyond that required to administer your membership and/or charge for use of club facilities, then we will seek your specific consent to use that data.

#### **3. What information we collect and why**

- 2.1 The table below lists the type of personal data that may be collected, the reason it is needed and why it is deemed to be a legitimate interest to the Club;

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis</b>
Member's names, postal address, telephone numbers, e-mail address and details of vessel where applicable.	Administering the club's membership. Managing the duty roster. Charging for use of club facilities. Communicating with members through newsletters and occasional updates.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club and keeping the membership well informed.
Member's name(s), boat name and sail number.	Managing race entries and race results. Publishing race results with other clubs, class associations, the RYA, and providing race results for publication by local and/or national media. Administering moorings and boat yard space.	For the purposes of our legitimate interests in holding races for the benefit of members, promoting and operating the Club.
Photos and/or videos of members and their boats.	Inclusion in Club publications in print and/or the Club's website.	Where a member or their vessel are clearly distinguishable, we will seek specific consent on a case by case basis.
Information entered on our website.	Communicating with the general public and membership. Providing shopping facilities.	For the purposes of our legitimate interests in operating the Club and keeping the membership well informed. Please see our website privacy policy for more detail.

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

- 4.1 We will not transfer your personal data outside the EU without your consent.
- 4.2 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.
- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5 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 required to do so by law or as set out in the table above or paragraph 5.2 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). 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.

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

- 6.1 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 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:
- to access your personal data
  - to be provided with information about how your personal data is processed
  - to have your personal data corrected
  - to have your personal data erased in certain circumstances
  - to object to or restrict how your personal data is processed
  - 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:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
0303 123 1113  
<https://ico.org.uk/concerns/>

## 8. Revision History

Revision	Date	Author	Description
Draft	February 2018	Violet Phillips	
1.0	10 April 2018	Richard Mason	Simplified
1.1	08 May 2018	Richard Mason	Section 3: Website clause
1.2	08 August 2018	Richard Mason	Addition of revision history

For more details, please address any questions, comments and requests regarding our data processing practices to the Clubs' Data Protection Officer either by post or email [dpo@hdsc.org.uk](mailto:dpo@hdsc.org.uk).