



Blackwater Sailing Club – Data Privacy Policy 2020

About this Policy:-

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

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

We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

We will always comply with the General Data Protection Regulations (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). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

We are The Blackwater Sailing Club, Basin Road, Heybridge, Maldon CM9 4SD. We can be contacted at secretary@blackwatersailingclub.org.uk

What information we collect and why:-

| Type of information | Purposes | Legal basis of processing |
|--------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Member's name, address, telephone numbers, e-mail address(es). | Managing the Member's membership of the Club. Keeping members informed as to Club activities and events. | Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club. |
| Date of birth / age related information | Managing membership categories which are age related | Performing the Club's contract with the Member. |
| Gender | Provision of adequate facilities for members and visitors. Summary anonymised data sent to RYA to inform diversity data required by Sports Councils. | For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. |
| Members and Visitors names, boat name, sail numbers, addresses and home clubs. | Managing visitors to the Club. Allocating moorings and compound spaces. | For the purposes of our legitimate interest in ensuring the Club rules on the number of times a visitor uses the Club are not breached. |
| Members, Competitors and Visitors names, boat names and sail numbers. | Managing race and event entries and race results. Sharing race results with other clubs, organisations, and the RYA, and providing race results to local and national media | For the purposes of our legitimate interests in holding races and other events for the benefit of members of the Club. |
| Members contact and boat details. | Information for Club officials and Official Agencies in event of emergency. To provide a members' directory and boat list available to other Members with opt-out option . | For our legitimate interests in operating the Club and assisting our members. Members can decide if their information is available to other Members. |

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| Type of information | Purposes | Legal basis of processing |
|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Photos and videos of members and their boats. | For display on the Club's website and social media pages and for use in press releases, our Yearbook and other publicity. | For the purposes of our legitimate interests in promoting the Club, its events and its members, and promoting the sport of sailing in general. |
| Radio call signs and mobile phone numbers. | Collected for events and shared between those organising and participating in events. | For the purposes of our legitimate interests in ensuring that boats in events can maintain contact with each other. |
| Bank account details of the member or other person making payment to the Club. | Bank details are only held to make payments to members i.e. refund an overpayment. | Performing the Club's contract with the Member. |
| Employee details as required for their employment with the Club. | Proper employment of staff by the Club. | For our legitimate interests in employing appropriate staff to provide the necessary service to our members and visitors. |
| Contractors' details in respect of contractors who have been or may be contracted to provide services to the Club. | Engagement of such contractors as may be required to maintain and enhance the facilities and services provided by the Club. | For our legitimate interests in maintaining and enhancing the facilities and services provided by the Club. For the proper performance of the contract with our Members. |
| Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience. | Managing instruction at the Club. | For the purposes of our legitimate interests in ensuring that we can contact those offering RYA and other instruction and training courses and provide details of instructors to members. |
| Names, addresses, email addresses and telephone numbers of training course students and prospective students. | Managing instruction at the Club. | For the purposes of our legitimate interests in ensuring that we can contact those desiring RYA and other instruction and training courses and provide details of courses to members and others. |
| The Member's name and e-mail address, whilst a current member and for up to three years after ceasing to be a member of the Club | Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club. | 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. |

How we obtain and protect your personal data:

We partner with serviced providers whose privacy and security policies are compliant with industry standards. The data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). Your data may also be processed by staff operating outside the EEA working for one of our suppliers. By submitting your data you agree to this transfer, storage and

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processing. We will take all reasonable steps to ensure your data IS TREATED SECURELY and in accordance with this privacy policy.

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. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

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

Who else has access to the information you provide us?

We will never sell or share your personal data with other organisations except:

To our service providers as required to operate our website and the Club.

To law enforcement agencies, in emergencies or where we are legally obliged to do so.

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.

When we have your express permission:

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.

How long do we keep your information?

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, and for our legitimate interests in managing the Club. We will review your personal data regularly 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 but it will be retained in an archived form to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

We securely destroy all financial information once we have used it and no longer need it.

Your rights:

You have rights under GDPR:

to access your personal data

to be provided with information about how your personal data is processed



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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.

If you have a complaint about how we process your personal data please write to the Honorary Secretary (secretary@blackwatersailingclub.org.uk) and if you are not satisfied you have the right to contact the Information Commissioner:

Information Commissioner's Office,
Wycliffe House, Water lane, Wilmslow,

Cheshire SK9 SAF

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

Helpline 0303 123 1113.

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Controller, who is the Honorary Secretary of the Club- secretary@blackwatersailingclub.org.uk or by post to the address shown above.