

# Nantwich & Border Counties Sailing Club

## GDPR (General Data Protection Regulation) Privacy Policy

### 1. About this Policy

- a. This policy explains when and why we collect personal information about our members, visitors and instructors, how we use it and how we keep it secure and your rights in relation to it.
- b. We may collect, use and store your personal data, as described in this Policy and as described when we collect data from you.
- c. We reserve the right to amend this Policy from time to time without prior notice. You are advised to check our website at [www.nantwichsail.com](http://www.nantwichsail.com) or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- d. 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. Who are we?

- a. We are Nantwich & Border Counties Sailing Club (the “Club”).
- b. For data protection issues, we can be contacted by writing to the Commodore whose name is in the Club Handbook or email [info@nantwichsail.com](mailto:info@nantwichsail.com)

### 3. The information we collect and why

Type of information	Purposes	Legal basis of processing
Member's <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Telephone number</li><li>• Email address</li></ul>	<ul style="list-style-type: none"><li>• Managing the Member's membership of the Club</li><li>• Managing the duty roster</li></ul>	Performing the Club's contract with the Member; and for the purposes of our legitimate interests in operating the Club
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member
The Member's <ul style="list-style-type: none"><li>• Name</li><li>• Boat name</li><li>• Sail number</li></ul>	<ul style="list-style-type: none"><li>• Managing race entries and race results</li><li>• Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media</li><li>• Allocating dinghy park berth spaces</li></ul>	For the purposes of our legitimate interests in holding races for the benefit of members of the Club For the purposes of our legitimate interests in promoting the Club. For the purposes of our legitimate interests in operating the Club

<p>Photos and videos of</p> <ul style="list-style-type: none"> <li>• Members</li> <li>• Their family members</li> <li>• Their boats</li> <li>• Their guests</li> </ul>	<ul style="list-style-type: none"> <li>• Putting on the Club's website</li> <li>• Newsletters</li> <li>• Social media pages</li> <li>• Using in press releases.</li> </ul> <p><b>Please Note:</b> <i>That only in special circumstances would we tag an image with the name of the person concerned.</i></p>	<p><b>Opt Out.</b> We will ask members to Opt Out on their membership application form and each membership renewal form. Members may also withdraw their consent at any time by contacting us by Email or letter. Use of an Opt Out process rather than Opt In will help the Club to follow the members' wishes</p>
<p>The Member's:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• e-mail address</li> <li>• Telephone numbers</li> </ul>	<p>Creating and managing the Club's online Membership Directory</p>	<p>Members control the information, if any, they share with others using the Dutyman system. Changes can be made by Login to your account and select the required options from the 'Privacy' tab.</p>
<p>Bank account details of the member or other person making payment to the Club</p>	<p>We do not retain any personal bank details other than those supplied on official bank statements</p>	
<p>Students (<i>Trainees/ Candidates</i>)</p> <ul style="list-style-type: none"> <li>• Name and age</li> <li>• Address</li> <li>• Email address</li> <li>• Phone numbers</li> <li>• Relevant qualifications and/or experience.</li> </ul>	<p>Managing trainees at the Club and keeping records as required by the RYA. * See specific purposes regarding RYA Training certificates below; and complaints procedure.</p>	<p>For the purposes of our legitimate interests in ensuring that we can contact those being offered instruction and provide details of trainees</p>
<p>Instructors</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• e-mail address</li> <li>• Phone Numbers</li> <li>• Relevant qualifications and/or experience.</li> </ul>	<p>Managing instructors at the Club and keeping records as required by the RYA</p>	<p>For the purposes of our legitimate interests in ensuring that we can satisfy ourselves and demonstrate that instructors are properly qualified and can contact those offering instruction and provide relevant details of instructors to members.</p>
<p>Trainees' medical details, next of kin and emergency contacts. And other forms as required by the RYA</p>	<p>Managing trainees at the Club and keeping records as required by the RYA</p>	<p>For the purposes of our legitimate interests in ensuring that we can comply with the contract we have with students to the training programme</p>

#### **\* RYA Training leading to a certificate**

On successful completion of a Powerboat Level 2 course the students' name, contact details, date of birth, certificate number and date of issue will be shared with the RYA through a secure web portal on [www.rya.org.uk](http://www.rya.org.uk). The data will be stored on the RYA's central database. This information allows the RYA to record your qualification, to update any records they may hold for you, and to verify or replace your certificate if required. For further information on how the RYA will deal with your data, please see the RYA's privacy policy at [www.rya.org.uk/go/privacy](http://www.rya.org.uk/go/privacy)."

On successful completion of other RYA training courses run at the Club (including Adult and Junior Dinghy Beginners, Improvers and Advanced courses and Safety Boat Course the students' name, certificate number and date of issue will be stored for up to 7 years. This information allows us to verify or replace your certificate if required. If a student does not wish their details to be stored then they may withdraw their consent at any time by contacting us by Email or letter. However it should be noted that if such details are not retained by the Club that neither the Club nor the RYA will be able to replace or verify their certificate in the future.

#### **Complaints Procedure**

The RYA may contact students when this is necessary for quality assurance of RYA training, for example in the investigation of a complaint or incident. In these instances the information is used solely for the requested purpose and is not entered on to the RYA central database.

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

- a. We will not transfer your personal data outside the EEA without your consent.
- b. 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.
- c. Please note, however, that when you are transmitting information to us over the internet absolute security cannot be guaranteed.
- d. We currently do not have facilities to take payments directly from you online. If such facilities were to be introduced, we would use a recognised online secure payment system.

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

- a. 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 b below.
- b. 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 would 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?**

- a. We will hold your personal data on our systems for as long as you are a member of the Club and for 3 years afterwards or, if longer, 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.
- b. We securely destroy by shredding all financial information once we have used it and no longer need it.

**7. Your rights**

- a. You have rights under the GDPR:
  - i. to access your personal data
  - ii. to be provided with information about how your personal data is processed
  - iii. to have your personal data corrected
  - iv. to have your personal data erased in certain circumstances
  - v. to object to or restrict how your personal data is processed
  - vi. to have your personal data transferred to yourself or to another business in certain circumstances.
- b. 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