

## **STOKES BAY SAILING CLUB (“Club”)- DATA PRIVACY POLICY (Updated 21<sup>st</sup> March 2023)**

### **About this Policy**

1.1 This policy explains when and why we collect personal information about our members, applicants for membership, volunteers, employees, and entrants to open events , 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 check our website [[www.stokesbay-sc.co.uk](http://www.stokesbay-sc.co.uk)] or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the Data Protection Act (**Act**)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 Act, we will be the “controller” of all personal data we hold about you.

### **2. Who are we?**

2.1 We are Stokes Bay Sailing Club. We can be contacted at Stokes Bay Road, Gosport, PO12 2BL, [administrator@stokesbay-sc.co.uk](mailto:administrator@stokesbay-sc.co.uk), 023 9258 1513.

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

Type of information	Purposes	Legal basis of processing
Name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Keeping in touch with the Member (including by newsletter). Managing the duty roster. Managing entries to open events. Managing applications for membership.	Performing the Club's contract with the Member, event entrant or applicant. For the purposes of our legitimate interests in operating the Club.  For the purposes of our legitimate interests in operating the Club.
The names and ages of Member's dependents	Managing the Member's and their dependents' membership of the Club	Performing the Club's contract with the Member.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's, event entrant's or applicant's vital interests and those of their dependents

Type of information	Purposes	Legal basis of processing
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member, event entrant or applicant.
Gender	Provision of adequate facilities for members.  Reporting information to the RYA.	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.  For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.

Type of information	Purposes	Legal basis of processing
The Member's, event entrant's or applicant's name, boat name and sail number	<p>Managing race entries and race results.</p> <p>Publishing race results at the club and 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 and entrants to open events.</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>
Photos and videos of Members, competitors in open events, and their boats	Putting on the Club's website, social media pages, newsletter and using in press releases.	Consent. We will seek the Member's consent at the point of membership application and the Member may withdraw their consent at any time by contacting us by e-mail or letter. We will seek the consent of entrants to open events at the point of entry and the entrant may withdraw their consent at any time by contacting us by e-mail or letter.

Type of information	Purposes	Legal basis of processing
The Member's applicant's or open event entrant's name and email address	Creating and managing the Club's online Membership Directory. Managing open events.	Consent. We will seek the Member's, applicant's or open event entrant's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.
The Member's name and email address, whilst a current member of the Club	Passing to the RYA for the RYA to conduct surveys of Members of the Club. See paragraph 5.3 below.	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.
Volunteer's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing volunteer support at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering support and provide details of volunteers to members.
Type of information	Purposes	Legal basis of processing

Type of information	Purposes	Legal basis of processing
Name, e-mail address and telephone number of each Club Officer	Information published on Club's website, 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	For the purposes of our legitimate interests in operating and promoting the Club
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website	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
Self Disclosure information of members via Self Disclosure form completed on application of or renewal of membership	To Check on membership validity for the purpose of safeguarding all persons employed at or using the club.	For the purposes of doing legitimate checks for Safeguarding of members and will be key element to accepting any membership application.
DBS Disclosure information	For managing the Safeguarding process of those in "regulated activity" ( regular contact with children) or committee members responsible for over seeing the Safeguarding of the club members.	Ensuring those in regular contact with children or managing the Safeguarding process within the club, are allowed by law to be in those roles.

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

4.1. We will not transfer your personal data outside the UK 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 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.

5.4 For those under going the DBS process, your personal data will be shared with the RYA Safeguarding team and then sent onto the DBS for checking.

5.5 All Self Disclosure forms filled in by members will be kept securely on Webcollect and accessed only by a small number relevant committee posts via a password entry into the system.

5.6 DBS certificates will not be held by the club – these are sent direct to the applicant. The Club can request to see the certificate if the online system indicates that there is content on the certificate. If applicant unwilling to show club, then alternative option is they send it to the RYA Safeguarding Manager. The only information kept by the club will be the applicants name, DBS certificate number, date of issue and recruitment decision.

## **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 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 and Disclosure information once we have used it and no longer need it.

## 7. Your rights explained

7.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Administrator ([administrator@stokesbay-sc.co.uk](mailto:administrator@stokesbay-sc.co.uk)).

(a) **The right to be informed (knowing how we will use your data).** You have the right to be told how we will use your Personal Data – which is set out in This Notice.

(b) **The right of access (being provided with copies of your data).** You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.

(c) **The right to rectification (changing incorrect information we hold).** If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.

(d) **The right to be forgotten (erasure) (requesting deletion of your Personal Data).** In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).

(e) **The right to restrict processing (limiting how we use your data).** In certain situations, you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.

(f) **The right to data portability (moving your data in a useable format).** You have the right to request the Personal Data you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party - in certain situations.

(g) **The right to object (when we must stop processing your data).** You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights, and freedoms; or the processing is for the establishment, exercise, or defence of legal claims.

(h) **The right not to be subject to automated decision-making including profiling (making a decision solely by automated means without any human involvement).** The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. [xxxx] club does not undertake automated decision making or profiling.

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

7.3 For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.