

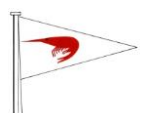
# HARWICH TOWN SAILING CLUB DATA PRIVACY POLICY

## Section 1 - About this Policy

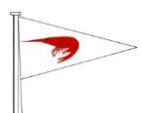
- 1.1 This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when 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 check our website ([www.htsc.co.uk](http://www.htsc.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 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.

## Section 2.0 - 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 ⇒ Managing the duty roster	⇒ 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 dependants	⇒ Managing the Member's and their dependants' 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 vital interests and those of their dependants
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	⇒ 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



Type of information	Purposes	Legal basis of processing
The Member's name, boat name and sail number	<ul style="list-style-type: none"> <li>⇒ Managing race entries and race results</li> <li>⇒ Sharing race results with other clubs and class associations and providing race results to local and national media</li> <li>⇒ Allocating compound spaces</li> </ul>	<ul style="list-style-type: none"> <li>⇒ For the purposes of our legitimate interests in holding races for the benefit of members of the Club</li> <li>⇒ For the purposes of our legitimate interests in promoting the Club</li> <li>⇒ For the purposes of our legitimate interests in operating the Club</li> </ul>
Photos and videos of Members and their boats	<ul style="list-style-type: none"> <li>⇒ Putting on the Club's website and social media pages and using in press releases.</li> </ul>	<ul style="list-style-type: none"> <li>⇒ Consent - we will seek the Member's consent on their membership application form and each membership renewal form</li> <li>⇒ The Member may withdraw their consent at any time by contacting us by e-mail or letter</li> </ul>
The Member's name and e-mail address	<ul style="list-style-type: none"> <li>⇒ Creating and managing the Club's online Membership Directory.</li> </ul>	<ul style="list-style-type: none"> <li>⇒ Consent - we will seek the Member's consent on their membership application form and each membership renewal form</li> <li>⇒ 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</li> </ul>
The Member's name and e-mail address, whilst a current member and for up to (a year) after ceasing to be a member of the Club	<ul style="list-style-type: none"> <li>⇒ Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club. See paragraph 4.3 below</li> </ul>	<ul style="list-style-type: none"> <li>⇒ 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</li> </ul>
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience	<ul style="list-style-type: none"> <li>⇒ Managing instruction at the Club</li> </ul>	<ul style="list-style-type: none"> <li>⇒ For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members</li> </ul>
Name, e-mail address and telephone number of each Club Officer	<ul style="list-style-type: none"> <li>⇒ Information published on Club's website, in Club's newsletter and other publications, in each case as a point of contact at the Club</li> </ul>	<ul style="list-style-type: none"> <li>⇒ For the purposes of our legitimate interests in operating and promoting the Club</li> </ul>



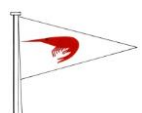
Type of information	Purposes	Legal basis of processing
Name, e-mail address and telephone number of each Club committee member	⇒ Information published on Club's website	⇒ For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	⇒ Entering into and managing arrangements with suppliers	⇒ Entering into and performing contracts with suppliers

### **Section 3.0 - How we protect your personal data**

- 3.1 We will not transfer your personal data without your consent.
- 3.2 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.
- 3.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 3.4 For any payments which we take from you online we will use a recognised online secure payment system.
- 3.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

### **Section 4.0 - Who else has access to the information you provide us**

- 4.1 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 4.2 and 4.3 below.
- 4.2 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 (eg 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 would disclose only the personal data that is necessary for the third party to deliver the service and we would have an agreement 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.
- 4.3 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.



### **Section 5.0 - How long do we keep your information?**

- 5.1 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.
- 5.2 We securely destroy all financial information once we have used it and no longer need it.

### **Section 6.0 - Your rights**

- 6.1 You have rights under the GDPR:
- (a) to access your personal data
  - (b) to be provided with information about how your personal data is processed
  - (c) to have your personal data corrected
  - (d) to have your personal data erased in certain circumstances
  - (e) to object to or restrict how your personal data is processed
  - (f) to have your personal data transferred to yourself or to another business in certain circumstances.
- 6.2 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

