



HOLLOWELL SAILING CLUB DATA PRIVACY POLICY

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:
<https://www.hollowellsc.org.uk/downloads.html> 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). 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 Hollowell Sailing Club. We can be contacted at :

Hollowell Sailing Club

Club House,

Hollowell,

Northampton

NN6 8RN

Email : secretary@hollowellsc.org.uk

3. **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 in touch with the Member (including by newsletter). Managing the duty roster.	Performing the Club's contract with the Member. For the purposes of our legitimate interests
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 which are age related	Performing the Club's contract with the Member.
Health related information obtained from participants undertaking training activities and performing instructing roles. For individuals booking courses at Hollowell Sailing Club Health related information will be sought from applicants in respect to relevant health conditions. This information will not normally be held for standard members unless a member wishes this to be held	To enable the Training Principal and lead instructor to consider risks and make reasonable adjustment for sailing activities. In addition, this information can be used to contact emergency services in the event of an emergency. <i>Health information is classed as a special category sensitive data within data protection regulations. Access to this information is only open to those with a legitimate purpose to do so.</i> <i>For Instructors who provide Health information this information is held separately and securely. It is also only open to those with a legitimate interest.</i>	Protecting the Member's vital interests and those of their dependants.
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.
	Reporting information to the RYA	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils
The Member's name, boat name and sail number	Managing race entries and race results.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club.
	Publishing race results at the club and with other clubs, class associations, and the RYA, and providing race results to local and national media.	For the purposes of our legitimate interests in promoting the Club.

	Allocating dinghy park spaces.	For the purposes of our legitimate interests in operating the Club
Photos and videos of members and their boats.	Putting on the Club's website, social media pages, newsletters and using in press releases.	We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by email or letter.
Bank account details of Members or another person making payment to the Club (Bank account details are not routinely collected as part of membership application process)	Managing the Member's and their dependants' membership of the Club, the provision of services and events.	Performing the Club's contract with the Member.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction and training at the club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.
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.
Closed Circuit Television (CCTV) on club premises	Club security and prevention of crime	For the purposes of our legitimate interests in operating the Club

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 required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.

For those completing the Powerboat 2 qualification details are required to be registered with the RYA in order to obtain a certificate.

- 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 (this includes WebCollect, DutyMan and GoCardless as membership database, duty rota management systems and direct debit service .) Access to the information held within this system is restricted to officers and administrators of the club who have legitimate cause to do so for the purposes of club operations and their specific role. 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.

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. 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 Data Protection Officer.

7.1.1. **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.

7.1.2. **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.

7.1.3. **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.

7.1.4. **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).

7.1.5. **The right to restrict processing (limiting how we use your data).** www.rya.org.uk © Royal Yachting Association Reviewed: 29 January 2021 Page 10 of 11.

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.

7.1.6. **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.

7.1.7. **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.

7.1.8. **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. Hollowell Sailing 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.

For more details, please address any questions, comments and requests regarding our data processing practices to:

James Avery
Club Data Protection Officer
dpo@hollowellsc.org.uk

Version Control log

Policy Approval :	Policy author:	Policy review interval
New policy approved May 2018 ver1.1	James Avery, Club Secretary & Data Protection Officer	Annually
Action	Change summary	Date for review
Policy review and amendment April 2019	Annual review in respect to GDPR guidance (Unchanged) Addition to table 3 and para 5.3 to reflect the RYA template policy and facilitate minimal information sharing for the purpose of conducting a membership survey.	May 2020
Policy and review and amendment June 2021	Policy reviewed and updated in line with RYA guidance and reflects changes that have come into force since Brexit.	May 2022