

# **Data Privacy Policy**

#### 1. Who are we?

1.1. We are Dartmouth Sailing Club (holdings) Ltd, trading as Dartmouth Yacht Club. We can be contacted at 22 South Embankment, Dartmouth, Devon TQ6 9BB http://www.dyc.org.uk/Tel 01803 832305.

## 2. About this Policy

- 2.1. 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.
- 2.2. 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.
- 2.3. We reserve the right to amend this Data Privacy Policy from time to time without prior notice.
- 2.4. 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). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

| Type of information  | Purposes   | Legal basis of processing  |
|--|--|--|
| Member's title, name, address,<br>telephone numbers and e-mail<br>address(es). | Managing the Member's<br>membership of the Club.<br>Managing newsletters,<br>general correspondence and<br>communication.<br>Reporting completed<br>Qualifications to the RYA. | Performing the Club's contract<br>with the Member.<br>For the purposes of our<br>legitimate interests in<br>operating the Club.<br>For the purposes of the<br>legitimate interests of the<br>Member and RYA. |
| Emergency contact details.   | Contacting next of kin in the event of emergency.  | Protecting the Member's vital<br>interests and those of their<br>dependants.   |

## 3. What information we collect and why.

| Date of birth / age related information.  | Managing membership<br>categories, awards and<br>activities that are age related.   | Performing the Club's contract with the Member.   |
|---|---|---|
| Gender.   | Provision of adequate facilities<br>for members.<br>Reporting information to the<br>RYA.  | For the purposes of our<br>legitimate interests in making<br>sure that we can provide<br>sufficient and suitable facilities<br>(including changing rooms and<br>toilets) for each gender.<br>For the purposes of the<br>legitimate interests of the RYA<br>to maintain diversity data<br>required by Sports Councils. |
| Health & medical conditions.  | Acting on the member's medical information in the event of an incident.   | Protecting the Member's vital interests and those of their dependants.  |
| Photos and videos of members<br>and their boats.  | Putting on the Club's website<br>and social media pages and<br>using in press releases.   | Consent. We will seek the<br>Member's consent on their<br>membership declaration form<br>and each membership<br>renewal form and the<br>Member may withdraw their<br>consent at any time by<br>contacting us by e-mail or<br>letter.  |
| Bank account details of the<br>member or other person<br>making payment to the Club.                              | Managing the Member's and<br>their dependants'<br>membership of the Club,<br>including the provision of<br>services, membership fees and<br>renewals. | Performing the Club's contract with the Member.   |
| CCTV recording on site.   | For the prevention and<br>detection of crime and<br>recording of any incidents that<br>may require investigation.                                     | For the purpose of our<br>legitimate interests in<br>ensuring that we provide, as<br>far as possible, a safe and<br>crime free environment for<br>our members and guests.   |
| Instructor's name, address,<br>email addresses, phone number<br>and relevant qualifications<br>and/or experience. | Managing instruction at the club.   | For the purposes of our<br>legitimate interest in ensuring<br>that we can contact those<br>offering instruction.  |

| Radio call signs.           | Collected for a rally and        | For the purposes of our         |
|-----------------------------|----------------------------------|---------------------------------|
|                             | shared between those             | legitimate interests in         |
|                             | participating in the rally.      | ensuring that boats on a rally  |
|                             |                                  | can maintain contact with       |
|                             |                                  | each other.                     |
|                             |                                  |                                 |
| Non-Member's name, address, | Collected for participation in a | For the purposes of our         |
| telephone numbers, e-mail   | particular event                 | legitimate interest that we can |
| addresses.                  |                                  | offer taster sessions.          |
|                             |                                  |                                 |
| Photos and videos of non-   | Putting on the Club's website    | Consent. We will seek their     |
| members taking part in      | and social media pages.          | consent on their participation  |
| activities.                 |                                  | form.                           |
|                             |                                  |                                 |

## 4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the EEA without your consent, unless we have signed a data processing agreement with non-EEA organisations that meet the data protection and privacy laws applicable in the EU.
- 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 are taken online, by our membership system provider Webcollect, 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 NOT sell your personal data. We will not share our personal data with any third parties without your prior consent (which you are fee to withhold) except where required to do so by law or as set out in the table above.

## 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.

We will keep the details of non-members once the activity has finished in archive form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, insurance rules 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.
- 6.3 CCTV images from around the site are continuously recorded on site in secure facilities. They are automatically deleted after 31 days unless downloaded for the purposes of further investigation or enquiry. Such downloads will only be retained for as long as is necessary and destroyed once no longer required.

## 7. Your rights

7.1 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.
- 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

For more details, please address any questions, comments and requests regarding our data processing practices to our [Data Protection Manager] Dartmouth Yacht Club, 22 South Embankment, Dartmouth, Devon TQ6 9BB.