## **GAIRLOCH BOAT CLUB**



## **PRIVACY of DATA POLICY**

### **GAIRLOCH BOAT CLUB**

# 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 <a href="http://www.spanglefish.com/GairlochBoatClub/index.asp">http://www.spanglefish.com/GairlochBoatClub/index.asp</a> 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). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

## 2. Who are we?

2.1 We are Gairloch Boat Club. We can be contacted at Pier Road, Gairloch, Wester Ross Iv21 2BQ, secretarygbc7@gmail.com or by telephone 01445 712094

## 3. What information we collect and why.

| Type of Information   | Purposes  | Legal basis of processing  |
|---|---|--|
| Member's name, address, telephone<br>numbers, e-mail address(ees).                          | Managing the Member's membership of the Club. Managing the duty roster.   | Performing the Club's contract with the<br>Member. For the purposes of our<br>legitimate interests in operating the<br>Club.   |
| The names and ages of the Member's<br>dependants<br>Date of birth / age related information | 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<br>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<br>Member  |
| Gender  | Provision of adequate facilities for<br>members.<br>Reporting information to the RYA.   | For the purposes of our legitimate<br>interests in making sure that we can<br>provide sufficient and suitable facilities<br>(including changing rooms and toilets)<br>for each gender.<br>For the purposes of the legitimate<br>interests of the RYA to maintain<br>diversity data required by Sports<br>Councils. |
| The Member's name, boat name and sail number  | Managing race entries and race results.<br>Sharing race results with other clubs,<br>class associations, and the RYA, and<br>providing race results to local and<br>national media. | For the purposes of our legitimate<br>interests in holding races for the benefit<br>of members of the Club.<br>For the purposes of our legitimate<br>interests in promoting the Club.  |

|   | Allocating moorings and compound spaces.   | For the purposes of our legitimate interests in operating the Club   |
|---|--|--|
| Type of Information   | Purposes   | Legal basis of processing  |
| Photos and videos of Members and their boats  | Putting on the Club's website and social<br>media pages and using in press<br>releases.  | Consent. We will seek the Member's<br>consent on their membership<br>application form and each membership<br>renewal form and the Member may<br>withdraw their consent at any time by<br>contacting us by e-mail or letter.  |
| Radio call signs  | Collected for a rally and shared between those participating in the rally.   | For the purposes of our legitimate<br>interests in ensuring that boats on a<br>rally can maintain contact with each<br>other.  |
| The Member's name and e-mail address  | Creating and managing the Club's online Membership Directory.  | Consent. We will seek the Member's<br>consent on their membership<br>application form and each membership<br>renewal form. The Member may<br>withdraw their consent at any time by<br>contacting us by e-mail or letter to tell<br>us that they no longer wish their details<br>to appear in the Membership Directory. |
| Bank account details of the member or<br>other person making payment to the<br>Club                             | Managing the Member's and their<br>dependants' membership of the Club,<br>the provision of services and events.  | Performing the Club's contract with the<br>Member  |
| Member's and former member's name<br>and email address  | Passing to the RYA for the RYA to<br>conduct surveys of Members and<br>former members of the Club (and other<br>clubs affiliated to the RYA). The surveys<br>are for the benefit of the Clubs (and<br>other clubs) and / or the benefit of the<br>RYA. | For the purposes of our legitimate<br>interests in operating the Club and / or<br>the legitimate interests of the RYA in its<br>capacity as the national body for all<br>forms of boating  |
| Instructor's name, address, email<br>addresses, phone numbers and relevant<br>qualifications and/or experience. | Managing instruction at the Club.  | For the purposes of our legitimate<br>interests in ensuring that we can<br>contact those offering instruction and<br>provide details of instructors to<br>members  |

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

4.1 We will not transfer your personal data outside the EU 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 paragraph 5.2 below.

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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). 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.

### 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 once we have used it and no longer need it.

### 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] Chairman Gairloch Boat Club, Pier Road, Gairloch IV21 2BQ.