

## **DURLEIGH SAILING CENTRE**

### **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 the Centre website [www.durleighsc.org](http://www.durleighsc.org) or our Centre noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 This Data Privacy Policy is reviewed annually.
- 1.5 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.
- 1.6 All members shall abide by this Data Privacy Policy.

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

- 2.1 We are Durleigh Sailing Centre. We can be contacted at Durleigh Reservoir, Enmore Road, Bridgwater, TA5 2AW/ [contact@durleighsc.org](mailto:contact@durleighsc.org).

### 3. What information we collect and why

#### 3.1

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
Member's name, address, telephone numbers, email address(es).	Managing the Member's membership of the Centre. Keeping in touch with the Member. Managing the duty roster.	Performing the Centre's contract with the Member.  For the purposes of our legitimate interests in operating the Centre.
Names and ages of the Member's dependents.	Managing the Member's and their dependents' membership of the Centre.	Performing the Centre'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 dependents.
Date of birth/age related information.	Managing membership categories which are age related.	Performing the Centre's contract with the Member.
Gender.	Provision of adequate facilities and services for members.  Reporting aggregated information to the RYA.	For the purposes of meeting our legal obligations (e.g. under the Equality Act 2010).  For the purposes of our legitimate interests in maintaining equality data and reporting this to the RYA and Sports Councils as required.
Disability.	Provision of adequate facilities and services for members.  Reporting aggregated information to the RYA.	For the purposes of meeting our legal obligations (e.g. under the Equality Act 2010).  For the purposes of our legitimate interests in maintaining disability data and reporting this to the RYA and Sports Councils as required.

<p>Member's name, boat name and sail number.</p>	<p>Managing race entries and race results.</p> <p>Publishing race results at the Centre and with other clubs, class associations, and the RYA.</p> <p>Allocating boat park spaces.</p>	<p>For the purposes of our legitimate interests in holding races for the benefit of members of the Centre.</p> <p>For the purposes of our legitimate interests in promoting the Centre.</p> <p>For the purposes of our legitimate interests in operating the Centre.</p>
<p>Photos and videos of Members and their boats, when associated with information making it possible to identify individuals, such as names.</p>	<p>Putting on the Centre's website, social media pages, and using in press releases.</p> <p>To use as training and coaching aids.</p>	<p>Consent. 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. Where the Member is under 18, their parent's or guardian's consent will be required.</p> <p>Please note that images that do not contain or are not associated with information making it possible to identify individuals do not constitute personal data, and consent will not therefore be sought for the publishing of such images. For example this includes, but is not limited to, photos of people sailing taken from the shore.</p>
<p>Radio call signs.</p>	<p>Collected for a rally and shared between those participating in the rally.</p>	<p>For the purposes of our legitimate interests in ensuring that boats on a rally can maintain contact with each other.</p>

Member's name, email address and phone number.	Creating and managing the Centre's Membership Directory.	Consent. We will seek the Member'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 email or letter to tell us that they no longer wish their details to appear in the Membership Directory.
Bank account details of the member or other person making payment to the Centre.	Managing the Member's and their dependents' membership of the Centre, the provision of services and events.	Performing the Centre's contract with the Member.
Member's name and email address whilst a current member of the Centre.	Passing to the RYA for the RYA to conduct surveys of Members of the Centre. See paragraph 5.3 below.	For the purposes of our legitimate interests in operating the Centre and/or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.
Instructor's name, address, email address(es), phone numbers and relevant qualifications and/or experience.	Managing instruction at the Centre.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.  To inform RYA inspections.
Course Member's name, address, email address, phone number and relevant qualifications.	Managing instruction at the Centre.  Registering certificates that are recorded by the RYA.	For the purposes of our legitimate interests in ensuring that we can contact Course Members to offer further instruction and confirm qualifications as required by them.  To inform RYA inspections.  To inform the RYA for their legitimate interests in recording certificates.

<p>Course Member's medical information, where they or their guardian (if under 18) have advised the Centre of medical information that may affect their ability to participate fully. Member's and parent's or guardian's name, address, email address, phone number and relevant details.</p>	<p>Managing instruction at the Centre by informing the Senior Instructor and relevant instructors of any special needs of the Course Member.</p>	<p>By consent, for the purposes of our legitimate interests in ensuring that we can provide the correct equipment and tailored instruction in the best interests of the individual student.</p> <p>To inform any first aid or emergency treatment that may be required.</p> <p>We may also use the information, anonymised, to justify the provision of specialist equipment and when applying for grants in support of this.</p>
<p>DBS disclosure. Date of issue, name, type of disclosure requested, position for which the disclosure was requested, reference number of the disclosure.</p>	<p>Managing instruction at the Centre.</p>	<p>For the purposes of our legitimate interests in ensuring that we can provide suitable instruction and supervision and protect the interests of Course Members and Instructors.</p>
<p>Training participation records.</p>	<p>Managing instruction at the Centre.</p>	<p>For the purposes of our legitimate interests in compiling RYA monthly reports for OnBoard and Sailability.</p> <p>To support grant applications and meet the conditions attached to previous grants.</p>
<p>Name, email address and telephone number of each Centre Officer.</p>	<p>Information made available to the RYA, in each case as a point of contact at the Centre.</p>	<p>For the purposes of our legitimate interests in operating the Centre.</p>
<p>Name, email address and telephone number of each Centre committee member.</p>	<p>Information shared within the Centre.</p>	<p>For the purposes of our legitimate interests in operating the Centre.</p>

Photo and name of Centre officers, committee members and instructors, displayed in the clubhouse.	For ease of identification to users of the Centre and for managing instruction at the Centre.	For the purposes of our legitimate interests in operating the Centre.
Employees and representatives of suppliers to the Centre.	Entering into and managing arrangements with suppliers.	Entering into and performing contracts with suppliers.

3.2 Data storage locations include, but are not limited to:

- a) Membership database
- b) Membership secretary's accounting software
- c) DutyMan duty rota system
- d) Sailwave race results system
- e) Minutes of meetings
- f) Emails
- g) Durleigh Sailing Centre website
- h) Durleigh Sailing Centre Facebook pages
- i) Boat park plan
- j) Centre notices displayed in the clubhouse
- k) Data exchanged between the Centre and the RYA

3.3 Where possible, any personal information discussed during meetings of the Management Committee and sub-committees of the Centre will be anonymised in the minutes. If this is not possible, circulation of the relevant section of the minutes will be restricted solely to those people who need to have the information. The version of the minutes circulated more widely will simply mention that information subject to the GDPR was discussed.

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

4.1.1 We will not transfer your personal data outside the EEA without your consent.

4.2 We have implemented generally accepted standards of technology and operational security 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 Centre and for performing our contract with you. However, we disclose only the personal data 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 Centre and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data necessary for the third party to do so and will have a contract in place that requires the third party to keep your information secure and not to use it for their own purposes.
- 5.4 WhatsApp (part of Facebook) groups may be used with your consent for the organisation of specific events or activities, in which case your mobile number will be available to the rest of the group, including future members of the group, unless and until you remove it.

## 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 Centre and for as long afterwards as it is in the Centre's 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 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 the Durleigh Sailing Centre Membership Secretary, via our [contact@durleighsc.org](mailto:contact@durleighsc.org) email.

(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 (deciding 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. The Centre 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.

If you have any queries, questions or comments on the information contained in this policy, please contact the Durleigh Sailing Centre Membership Secretary, via our [contact@durleighsc.org](mailto:contact@durleighsc.org) email.