Data Privacy Policy

About this Policy

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.

For the purposes of this policy “Members” includes those who are temporary members of the Club, which includes competitors at Open Meetings.

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.

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.grafham.org regularly for any amendments (but amendments will not be made with retrospective effect)

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 https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/

For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

What information we collect and why

<table>
<thead>
<tr>
<th>Type of information</th>
<th>Purposes</th>
<th>Legal basis of processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Member’s name, address, telephone numbers, e-mail address(es).</td>
<td>Managing the Member’s membership of the Club. Managing the duty roster.</td>
<td>Performing the Club’s contract with the Member. For the purposes of our legitimate interests in operating the Club.</td>
</tr>
<tr>
<td>The names and ages of the Member’s dependants if any</td>
<td>Managing the Member’s and their dependants’ membership of the Club</td>
<td>Performing the Club’s contract with the Member.</td>
</tr>
<tr>
<td>Emergency contact details</td>
<td>Contacting next of kin in the event of emergency</td>
<td>Protecting the Member’s vital interests and those of their dependants</td>
</tr>
<tr>
<td>Date of birth / age related information</td>
<td>Managing membership categories which are age related</td>
<td>Performing the Club’s contract with the Member.</td>
</tr>
<tr>
<td>Gender</td>
<td>Provision of adequate facilities for members.</td>
<td>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. For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>The Member’s name, boat name and sail number</td>
<td>Managing race entries and race results. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media. Allocating moorings and compound spaces.</td>
<td>For the purposes of our legitimate interests in holding races for the benefit of members of the Club. For the purposes of our legitimate interests in promoting the Club. For the purposes of our legitimate interests in operating the Club.</td>
</tr>
<tr>
<td>Photos and videos of members and visitors and their boats which allow identification of the individual directly or indirectly</td>
<td>Putting on the Club’s website and social media pages and using in press releases.</td>
<td>Consent: We will seek consent to publish photographs or video which enable the identification of an individual, directly or indirectly, when a member joins or renews their membership or a visitor signs up for an event. You may withdraw consent at any time by contacting us by e-mail. Performing the Club’s contract with the Member.</td>
</tr>
<tr>
<td>Bank account or credit card details of the member or other person making payment to the Club</td>
<td>Managing the Member’s and their dependants’ membership of the Club, the provision of services and events.</td>
<td>Managing instruction 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.</td>
</tr>
</tbody>
</table>

**How we protect your personal data**

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

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.
Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

For any payments which we take from you online we will use a recognised online secure payment system.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

**Who else has access to the information you provide us?**

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 below.

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.

**How long do we keep your information?**

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 securely destroy all financial information once we have used it and no longer need it.

**Rights**

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.

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

[https://ico.org.uk/concerns/](https://ico.org.uk/concerns/)

Phone: 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 the Club Office: office@grafham.org

01 April 2021