

OTLEY SAILING CLUB

# DATA PROCESSING AND PRIVACY POLICY

Version 1.1 / February 2020

Note: to be updated post Brexit (see 4.1 below).

Otley Sailing Club takes your privacy seriously and will only use your personal information for the purposes of running the club, for informing you of club events, and for your safety.

## 1. About this Policy

1.1 This policy explains when and why we collect personal information about our members, instructors, and training course participants, 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 Processing Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website (<http://www.otley-sailingclub.co.uk>) 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 1984 / 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.

## 2. Who are we?

2.1 We are Otley Sailing Club. We can be contacted at:  
Otley Sailing Club, Bridge End Quarry, Otley, LS21 2SU  
[enquiries@otleysc.org](mailto:enquiries@otleysc.org)  
01943 850391

### 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)  e-mail address(es)	Managing the Member's membership of the Club. Managing the club roster.  Informing member of club activities.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.  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 e-mail or letter, or by withdrawing consent under membership settings on the website.
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.
Member's date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
Member's 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.
	Sharing race results 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 moorings and compound 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 and social media pages and using in press releases.	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 e-mail or letter.
Bank account details of the member or other person making payment to the club.	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 address(es), phone numbers, details of relevant qualifications and/or experience, DBS number and expiry date, and declaration.	Managing instruction at the club, keeping records of qualifications, and logging details of qualifications with the RYA.	For the purposes of our legitimate interests in ensuring that our instructors' qualifications and background checks are up-to-date, that we can contact those offering instruction, and to provide details of instructors to members.
Volunteer's name, address, email addresses, phone numbers, DBS number and expiry date.	Managing volunteering at the club.	For the purposes of our legitimate interests in ensuring that our volunteers background checks are up-to-date, and that we can contact volunteers.

<p>Names, addresses, telephone numbers, e-mail addresses, date of births, genders, medical information, and records of qualifications for course attendees.</p>	<p>Managing the running of training courses and safety during these courses at the club, issuing certificates*, and logging details of qualifications with the RYA**.</p>	<p>Consent (of the individual (or parent / guardian for U-18s)) on registration for the course. We will seek consent when a member or non-member registers for a training course.</p>
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\* On successful completion of an RYA sailing course your name, certificate number and date of issue will be stored for up to 7 years. This information allows us to verify or replace your certificate if required.

\*\* On successful completion of a powerboat L1 and L2 course your name, contact details, date of birth, certificate number and date of issue will be shared with the RYA through a secure web portal on [www.rya.org.uk](http://www.rya.org.uk). The data will be stored on the RYA's central database. This information allows the RYA to record your qualification, to update any records they may hold for you, and to verify or replace your certificate if required. For further information on how the RYA will deal with your data, please see the RYA's Privacy Policy at [www.rya.org.uk/go/privacy](http://www.rya.org.uk/go/privacy).

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

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

Note: this policy will be updated in 2021 when post-Brexit data protection guidelines become available.

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. Data is stored on a secure server, is password protected and can be accessed only by a limited number of Otley Sailing Club committee members.

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 (currently PayPal).

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.

5.2 If you lodge a complaint about Otley Sailing Club, the RYA may have access to your data in order to investigate the complaint. The data will be used solely for this purpose.

#### **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 and club operations. The periods will be:

- normally no longer than 12 months
- for RYA course attendees, 12 months or until the next RYA inspection, whichever is the longer period
- for certificate details

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 membership secretary.