



## **CHANONRY SAILING CLUB 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 our website [[www.chanonry.org.uk/privacy-policy.html](http://www.chanonry.org.uk/privacy-policy.html)] 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](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 Chanonry Sailing Club. We can be contacted at The Harbour, St Andrews Walk, Fortrose, IV10 8TP and [info@chanonry.org.uk](mailto:info@chanonry.org.uk).

### **3. What information we collect and why.**

| <b>Type of information</b>   | <b>Purposes</b>   | <b>Legal basis of processing</b>   |
|--|---|--|
| Member's name, address, telephone numbers, e-mail address(es), membership type, boat details, including those of other members in a Family membership. | Managing the Member's membership of the Club.<br>Managing the duty roster.<br><br>The data processor for these purposes is Dutyman whose own privacy policy can be found at <a href="https://dutyman.biz/Privacy/">https://dutyman.biz/Privacy/</a> | Performing the Club's contract with the Member including others in a Family membership.<br><br>For the purposes of our legitimate interests in operating the Club. |
| Visitor's name, address, telephone numbers, e-mail address, emergency contact details, boat details and relevant health information.                   | Managing race entries and race results for Open events.<br><br>Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.<br><br>Managing taster sessions.                     | For the purposes of our legitimate interests in holding races and offering taster sessions for the benefit of visitors to the Club.                                |
|  | Contacting next of kin in the event of emergency.   | Protecting the visitor's vital interests.  |

| <b>Type of information</b>   | <b>Purposes</b>  | <b>Legal basis of processing</b>  |
|--|--|---|
| Date of birth / age related information.   | Managing membership categories which are age related.  | Performing the Club's contract with the Member.   |
| The Member's name, boat class, boat name and sail number.  | Managing race entries and race results.<br>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 holding races for the benefit of members of the Club.   |
|  | Administering craning operations, moorings and Dinghy Park 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 Members may withdraw their consent at any time by contacting us by e-mail or letter.   |
| Radio call signs.  | Collected for a cruiser event and shared between those participating in the event.   | For the purposes of our legitimate interests in ensuring that boats taking part in a cruiser event can maintain contact with each other   |
| The Member's name, address and e-mail address  | Creating and managing the Club's online Membership Directory.<br><br>Contacting members by means of newsletters and other updates on Club activities.                      | Consent. We will seek the Member's consent on their membership application form and each membership renewal. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory and/or no longer consent to receiving Club newsletters and updates. |
| Bank account details of the member or other person owing money to the Club, making payment to the Club, receiving payment from the Club. | Managing member's and their dependants' membership of the Club.  | Performing the Club's contract with the drawer or payee.  |
|  | The provision of services and events.  | For the purposes of our legitimate interests in maintaining Club accounts.  |

| <b>Type of information</b>   | <b>Purposes</b>   | <b>Legal basis of processing</b>  |
|--|---|---|
| Address, email address, date of birth, phone numbers, RYA membership number where applicable, emergency contact details, health information of members attending formal RYA courses. | Passing to the RYA for the purposes of registration of those certificates centrally recorded by the RYA.<br>Maintaining a record of RYA certificates issued locally and recorded by the Club. | For the purposes of our legitimate interests in operating the Club as an RYA Recognised Training Centre.  |
|  | Contacting next of kin in the event of emergency.   | Protecting the Member's vital interests and those of their dependants.  |
| Address, email address, date of birth, phone numbers, emergency contact, health information of members attending Club training and coaching.   | Managing training and coaching at the Club.   | For the purposes of our legitimate interests in operating the Club.   |
|  | Contacting next of kin in the event of emergency.   | Protecting the Member's vital interests and those of their dependants.  |
| Instructor's and coach's name, address, email address, phone numbers, date of birth, RYA membership number (where applicable) and relevant qualifications and/or experience.         | 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 |

#### **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.
- 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 Club Members - 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 Visitors – We will hold your personal data on our systems for as long as you are a Visitor at 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. 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.
- 6.3 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 Lead, [membership@chanonry.org.uk](mailto:membership@chanonry.org.uk), The Membership Secretary, Chanonry Sailing Club, The Harbour, St Andrews walk, Fortrose, IV10 8TP.