



# DELL QUAY SAILING CLUB

## DATA PRIVACY POLICY

### 1. About this Policy

- 1.1. This policy explains when and why Dell Quay Sailing Club (“we”) collect personal information about our members, how we use it and 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 Club’s website ([www.dellquaysc.co.uk](http://www.dellquaysc.co.uk)) or the Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.4. We will always comply with the General Data Protection Regulations (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, the Club will be the “controller” of all personal data we hold about you.

### 2. Who are we?

- 2.1. We are Dell Quay Sailing Club. We can be contacted at Dell Quay, Chichester, West Sussex, PO20 7EE, 01243 785080, [info@dellquaysc.co.uk](mailto:info@dellquaysc.co.uk).

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

Type of Information	Purposes	Legal Basis of Processing
Member’s name, address, telephone numbers, e-mail address.	Managing the Member’s membership of the Club.	Performing the Club’s contract with the Member.
	Managing the Club’s duty roster.	For the purposes of our legitimate interests in operating the Club.
	Sharing news via hard copy and electronic newsletters.	For the purposes of our legitimate interests in operating the Club.

<b>Type of Information</b>	<b>Purposes</b>	<b>Legal Basis of Processing</b>
Member's bank account details <sup>1</sup> .	Managing the Member's membership of the Club.  Managing Club activities.	Performing the Club's contract with the Member.  For the purposes of our legitimate interests in operating the Club.
Committee Member's name, address, telephone numbers, e-mail address, professions, dates of birth, nationality, positions held and dates.	Managing the Club	For the purposes of fulfilling legal obligations as Officers of the Club.
Member's Disclosure and Barring Service (DBS) outcome decisions <sup>2</sup> .	Managing Club activities.	For the purposes of fulfilling legal obligations of the Club.
Emergency contact details.	Contacting next of kin in the event of emergency.	Protecting the Member's vital interests and those of their dependants
Member's name, telephone number, e-mail address, medical information and dietary requirements.	Managing the participation in Club activities.	For the purposes of our legitimate interests in holding activities for the benefit of members of the Club.
Member's name, telephone numbers	Creating and managing the Club's Membership Directory incorporated into the Club's annual Yearbook.	Consent. We will seek the Member's consent and the Member may withdraw their consent at any time by contacting us by email.
Date of birth / age related information.	Managing membership categories which are age related.  Managing the participation in age related Club activities.  Managing the Club's duty roster.	Performing the Club's contract with the Member.  For the purposes of our legitimate interests in holding activities for the benefit of members of the Club.  For the purposes of our legitimate interests in operating the Club.
Member's relevant qualifications and experience.	Managing the Club's duty roster.	For the purposes of our legitimate interests in operating the Club.

<sup>1</sup> Only for members selecting to pay by direct debit, and for those that receive re-imbusement for expenses from the Club.

<sup>2</sup> Only where the Club specifically requests a DBS check so that the Member can assist with Junior activities.

<b>Type of Information</b>	<b>Purposes</b>	<b>Legal Basis of Processing</b>
Member's name, boat class, boat name and sail number.	<p>Managing the berthing and mooring spaces.</p> <p>Managing race entries and race results.</p> <p>Sharing race results with other clubs, class associations, and the RYA, publishing race results on the Club website, and providing race results to local and national media.</p>	<p>For the purposes of our legitimate interests in operating the Club.</p> <p>For the purposes of our legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p>
Non-member's name, boat class, boat name and sail number.	<p>Managing race entries and race results.</p> <p>Sharing race results with other clubs, class associations, and the RYA, publishing race results on the Club website, and providing race results to local and national media.</p>	<p>For the purposes of our legitimate interests in holding races for the benefit of members and visitors to the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p>
Member's name and e-mail address whilst a current member of the Club.	Passing to the RYA for the RYA to conduct surveys of Members of the Club (see Para 5.3 below).	For the purposes of our legitimate interests in operating the Club and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.
Photos and videos of members and their boats (including webcam images).	Publishing on the Club website and social media pages and using in press releases.	Consent <sup>3</sup> . We will seek the Member's consent and the Member may withdraw their consent at any time by contacting us by email.
Closed Circuit Television (CCTV) images	Protecting the Member's and Club's property.	For the purposes of our legitimate interests in operating the Club.

<sup>3</sup> Where the club needs Consent as the lawful basis for processing personal data, this is an individual requirement for all members. For children aged under 13, consent is required from whoever holds parental responsibility for the child.

<b>Type of Information</b>	<b>Purposes</b>	<b>Legal Basis of Processing</b>
Name, telephone number and e-mail address of members of the public making club enquiries.	Replying to enquiries about Club membership and/or activities.	For the purposes of our legitimate interests in promoting the Club and recruitment of Members.
Instructor's name, address, e-mail address, telephone number 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.
Contractor's name, address, e-mail address, telephone number and details of the goods and services offered by the Contractor.	Managing the supply of goods and services to the Club.	For the purposes of our legitimate interests in ensuring the efficient operation of the Club.

#### **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, the following:
  - 4.3.1. Where you are transmitting information to us over the internet or via e-mail, this can never be guaranteed to be 100% secure.
  - 4.3.2. As a volunteer club, the majority of data processing is undertaken away from the club premises and on personal computers and electronic devices. Wherever possible, cloud storage and processing is used, but there will be instances where data is stored on personal devices. All members involved with data processing have been informed about device security and password protection.
- 4.4. 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 paragraphs 5.2 to 5.5 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 will 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 (subprocessors) 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 club and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.
- 5.4. Information relating to company directors is provided to Companies House and is made available to the public. Information will include name, address, occupation, nationality and date of birth, and will be retained by Companies House indefinitely. More information can be found here <https://www.gov.uk/government/organisations/companies-house/about/personal-information-charter>
- 5.5. We use a number of third party providers to assist with Club administration. The providers and links to their Privacy Policies are set out below:
  - 5.5.1. Sailing Club Manager for membership system <https://www.sailingclubmanager.com/terms/privacy-policy>
  - 5.5.2. Dutyman for duty roster <https://dutyman.biz/privacy/>
  - 5.5.3. HalSail for race results <https://www.halsail.com/Help> (select Terms and Condition of Use for HalSail)
  - 5.5.4. Constant Contact for e-newsletters <https://www.constantcontact.com/uk/legal/privacy-statement>
  - 5.5.5. Jotform for activity registration <https://www.jotform.com/privacy>

## **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 we are required 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. defence of legal claims.

- 6.2. If, after you cease to be a member of the Club, you ask to remain on the newsletter mailing list, then we will continue to store your name and email address for this purpose until you ask for them to be deleted.
- 6.3. Records of your race positions and trophies awarded will be retained in the Club archives both while you are a Member and after you have resigned your membership of the Club.
- 6.4. We securely destroy all financial information once we have used it and no longer need it.

## 7. Your rights

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 below please contact our Data Protection Manager ([subscription@dellquaysc.co.uk](mailto:subscription@dellquaysc.co.uk)):

- 7.1.1. **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 Privacy Policy.
- 7.1.2. **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.
- 7.1.3. **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 below.
- 7.1.4. **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).
- 7.1.5. **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.
- 7.1.6. **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.
- 7.1.7. **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.

7.1.8. **The right not to be subject to automated decision making including profiling (making a decision 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. Dell Quay Sailing Club 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.

7.4. Please address any questions, comments and requests regarding our data processing practices to the Honorary Data Services Secretary in their capacity as our Data Protection Manager ([subscription@dellquaysc.co.uk](mailto:subscription@dellquaysc.co.uk))