

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) 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). 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.

3. What information we collect and why.

Type of Information	Purposes	Legal Basis of Processing
Member's name, address,	Managing the Member's	Performing the Club's
telephone numbers, e-mail	membership of the Club.	contract with the Member.
address.		
	Managing the Club's duty	For the purposes of our
	roster.	legitimate interests in
		operating the Club.

Type of Information	Purposes	Legal Basis of Processing
Member's bank account	Managing the Member's	Performing the Club's
details ¹ .	membership of the Club.	contract with the Member.
	Managing Club activities.	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 ² .	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 on their membership application form 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.	Performing the Club's contract with the Member.
	Managing the participation in age related Club activities.	For the purposes of our legitimate interests in holding activities for the benefit of members of the Club.
	Managing the Club's duty roster.	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.

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 $^{^{1}}$ Only for members selecting to pay by direct debit, and for those that receive re-imbursement for expenses from the Club.

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

Type of Information	Purposes	Legal Basis of Processing
Member's name, boat class,	Managing the berthing and	For the purposes of our
boat name and sail number.	mooring spaces.	legitimate interests in operating the Club.
	Manging race entries and race results.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club.
	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.	For the purposes of our legitimate interests in promoting the Club.
Photos and videos of	Publishing on the Club	Consent ³ . We will seek the
members and their boats	website and social media	Member's consent on their
(including webcam images).	pages and using in press releases.	membership application form 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.
Member's name, address and e-mail address.	Sharing news via hard copy and electronic newsletters.	Consent. We will seek the Member's consent on their membership application form and the Member may withdraw their consent at any time by contacting us by email.
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.

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³ 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.

Type of Information	Purposes	Legal Basis of Processing
Contractor's name, address,	Managing the supply of	For the purposes of our
e-mail address, telephone	goods and services to the	legitimate interests in
number and details of the	Club.	ensuring the efficient
goods and services offered		operation of the Club.
by the Contractor.		

4. How we protect your personal data.

- 4.1. 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 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 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). 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.

- 5.3. 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
- 5.4. 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:
 - 5.4.1. Medusa for membership system https://sailingclubsoftware.com/privacy/
 - 5.4.2. Dutyman for duty roster https://dutyman.biz/privacy/
 - 5.4.3. HalSail for race results https://www.halsail.com/Help (select Terms and Condition of Use for HalSail)
 - 5.4.4. Constant Contact for e-newsletters https://www.constantcontact.com/uk/legal/privacy-statement
 - 5.4.5. 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 a period of 36 months after you cease to be a member, or for as long as we are required to comply with our legal obligations, whichever is the longest. 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. You have rights under the GDPR:
 - 7.1.1. to access your personal data

- 7.1.2. to be provided with information about how your personal data is processed
- 7.1.3. to have your personal data corrected
- 7.1.4. to have your personal data erased in certain circumstances
- 7.1.5. to object to or restrict how your personal data is processed
- 7.1.6. 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

7.3. For more details, 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)