



The Nottingham Sailing Club Data Protection Policy

Version 1.0

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Contents

1	About this Policy	3
2	What Information does The Club collect and why?	3
3	How do we protect your Personal data?	5
4	Who else has access to your Personal data?	5
5	How long do we keep your Personal data?	5
6	Your Rights under this Policy	6

1 About this Policy

1.1. This Policy acknowledges the requirements of the General Data Protection Regulations (GDPR). The Nottingham Sailing Club (the Club) needs to gather and process certain information about individuals it has a relationship with or may need to contact as part of the Services it offers. This policy explains when and why we collect personal information about our members and third parties, how we use it, how we keep it secure and your rights in relation to it.

1.2. The Club may collect, use and store your personal data, as described in this Policy and/or as described when we collect data from you.

1.3. The Club reserves the right to amend this Policy from time to time without prior notice. You are advised to check our website www.nottinghamsc.org.uk or our Club noticeboard regularly for any amendments agreed by the Club Executive committee.

1.4. The Club 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 of the Information Commissioner at www.ico.gov.uk.

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

2 What Information does The Club collect and why?

Information Type	Purpose of Data Collection	Legal Basis of Processing
Member’s or Trainee’s name, address and telephone numbers.	<ul style="list-style-type: none"> Informing members concerning the services and events offered to the membership of the Club. Managing the Sailing programme duty roster. Managing Training Events. 	<ul style="list-style-type: none"> Performing the Club’s contract with the Member. Consent: Members or Trainees must opt-in for each form of communication on membership/training application forms and annual membership renewal. Members/Trainees can also opt-out at any time. For the purposes of the legitimate interests in operating the Club and contacting members.
Emergency Contact Details.	<ul style="list-style-type: none"> Contacting next of kin in the event of an emergency. 	<ul style="list-style-type: none"> Protecting the vital interests of members and their dependents and assisting emergency services.
The names and ages of the Member’s dependants.	<ul style="list-style-type: none"> Managing dependents membership of the club. Managing Junior sailing activities. 	<ul style="list-style-type: none"> Performing the Club’s contract with the member.
Date of Birth and Age-related information.	<ul style="list-style-type: none"> Managing age related sailing events. Managing categories of membership. 	<ul style="list-style-type: none"> Performing the Club’s contract with the member.
Gender.	<ul style="list-style-type: none"> Provision of appropriate facilities for members. Anonymous Reporting of information to the RYA. 	<ul style="list-style-type: none"> For the purposes of the Club’s 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.
Member’s name, boat name and sail number.	<ul style="list-style-type: none"> Managing the Club race programme, including race entries and publishing race 	<ul style="list-style-type: none"> For the purposes of our legitimate interests in holding races for the benefit of members of the Club.

	<p>results.</p> <ul style="list-style-type: none"> • Sharing race results with other clubs, class associations, and the RYA. • Publishing race results to local and national media. • Managing Berthing space in the Club dinghy park. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in promoting the Club. • For the purposes of efficient operation of the Club facilities.
Images of members, trainees and their boats.	<ul style="list-style-type: none"> • Putting on the Club's website, social media pages and using in press releases. • Use in the course of training events for improving technique. 	<ul style="list-style-type: none"> • Consent. We will seek the Member's consent on their membership application form. • We will seek the Trainee's consent on their training application form. • Members and Trainees may withdraw their consent at any time by contacting us by e-mail or letter.
Bank account details of the Member, other person, or supplier requiring payment from the Club.	<ul style="list-style-type: none"> • Efficient payment of monies owed by the Club. 	<ul style="list-style-type: none"> • For the purposes of the legitimate interests in operating the Club.
Member's name and e-mail address, <i>whilst a current</i> member and thereafter long enough to comply with legal obligations.	<ul style="list-style-type: none"> • Passing to the RYA for the RYA to conduct surveys of members and former members of the Club. See paragraph 5.3 below. 	<ul style="list-style-type: none"> • For the purposes of the 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.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	<ul style="list-style-type: none"> • Managing the delivery of Training events at The Club. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and manage the level of qualification in the Club in line with RYA requirements.
Name, email address and telephone number of each Club Officer.	<ul style="list-style-type: none"> • Make available to the RYA, in each case as a point of contact at the Club. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in operating and promoting the Club.
Names, email address and telephone number of each Club Executive/ Sailing Committee member.	<ul style="list-style-type: none"> • For the purposes of arranging Club Executive and Sailing Committee meetings and circulating associated minutes. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in operating and promoting the Club.
Employees and representatives of suppliers to the Club.	<ul style="list-style-type: none"> • Entering into and managing arrangements with suppliers. 	<ul style="list-style-type: none"> • Entering into and performing contracts with suppliers.
Safeguarding self-declaration certificate details for those working with children or vulnerable adults.	<ul style="list-style-type: none"> • To comply with Safeguarding legislation and best practice. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in Safeguarding children and vulnerable adults at the Club.
Accident and near-misses personal data.	<ul style="list-style-type: none"> • To review, learn from and take steps to reduce and/or prevent accidents in the future. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in safety at the Club and defence of potential legal claims.
Health and Dietary requirements.	<ul style="list-style-type: none"> • To ensure arrangements are in place to support safe delivery of training events. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in safety at the Club and defence of potential legal claims.
General Individual Correspondence.	<ul style="list-style-type: none"> • Required for the purposes of dealing with matters arising within the Club. 	<ul style="list-style-type: none"> • For the purposes of our legitimate interests in managing contact with membership of other external parties.

3 How do we protect your Personal data?

- 3.1.** The Club will not transfer your personal data outside the EU without your consent.
- 3.2.** The Club have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 3.3.** Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 3.4.** For any payments which The Club take from you online we will use a recognised online secure payment system.
- 3.5.** The Club will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

4 Who else has access to your Personal data?

- 4.1.** 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 4.2 and 4.3 below.
- 4.2.** 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, Club handbook and sending you mailings). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. 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. It is possible that third parties may themselves engage others (sub-processors) 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 information is kept secure and not used for their own purposes.
- 4.3.** 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 personnel 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.
- 4.4.** Please note in certain circumstances, the Data Protection Act and GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

5 How long do we keep your Personal data?

- 5.1.** 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 is necessary to comply with our legal obligations.
- 5.2.** We will review all personal data (member, potential member, instructor or contractor) every year to establish if we are still entitled to process it. If we decide it is no longer in our legitimate interest to do so, we will stop processing this data with exception to data that we need archived to comply with future legal obligations. e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.
- 5.3.** We securely destroy all financial information once we have used it and no longer need it.

6 Your Rights under this Policy

6.1. All individuals who are the subject of personal data held by The Nottingham Sailing Club are entitled to:

- Ask what information the Club holds about them and why.
- Ask how the Club processes your personal data.
- Be informed how to keep your personal data up to date.
- Ask for your personal data to be corrected.
- Ask for your personal data to be deleted in certain circumstances.
- Object to or restrict how your personal data is processed by the Club.

6.2. Should you need to contact The Nottingham Sailing Club requesting this information, this is called a *subject access request*. Subject access requests from individuals should be made by emailing the Club Honorary Secretary at **club@nottinghamsc.org.uk** or writing to:

The Nottingham Sailing Club
Adbolton Lane
West Bridgford
Nottingham
NG2 5AS

6.3. The Club will aim to provide the required information or confirm that information has been modified or deleted **within 14 days of receipt**. The Club will seek to verify the identity of anyone making a subject access request before handing over any information.

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

Information Commissioner:
0303 123 1113

Information Commissioner's Office,
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF