

ITCHENOR SAILING CLUB
DATA PROTECTION POLICY

1. About this Policy

- 1.1. This policy explains when and why Itchenor Sailing Club (“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 Protection Policy and as described when we collect data from you.
- 1.3. We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our website (www.itchenorsc.co.uk) 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, we will be the “controller” of all personal data we hold about you, and our General Manager is our Data Protection Manager.

2. Who are we?

- 2.1. We are Itchenor Sailing Club. We can be contacted at:

Itchenor Sailing Club, Itchenor, Chichester, West Sussex PO20 7AG
Tel No. 01243 512400
Email: office@itchenorsailingclub.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(es).	Managing the Member's membership of the Club.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
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.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants.

Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
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. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media. Allocating compound spaces.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club. For the purposes of our legitimate interests in promoting the Club. For the purposes of our legitimate interests in operating the Club
The Member's name telephone number and email address and interest in a particular class	Managing the activities of each class, informing Members interested of news and upcoming activities relating to each class, and informing them of crewing opportunities.	For the purposes of our legitimate interests in promoting the activities of each class.
Photos and videos of members and their boats	Putting on the Club's website and social media pages and using in press releases	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 e-mail or letter. In respect of Junior Members we seek parental consent annually.

The Member's name, address and e-mail address	Creating and managing the Club's Membership Directory incorporated into the Club's yearly Handbook	Consent. We will seek the Member's consent on their membership application form. 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.
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.
Qualifications of Members, for example RYA qualifications, power boat driving qualifications, first aid etc.?)	To facilitate management of the Club's duties roster	For the purposes of our legitimate interests of safely operating the Club's activities.
Potential Member's name, telephone number and email address	To inform the potential member of the activities and opportunities at the Club to assist recruitment of potential Members	For the purposes of our legitimate interests in promoting the Club and recruitment of Members
Instructor's name, address, email addresses, phone numbers 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.
Contractor's name, address, email addresses and telephone numbers and details of the goods and services offered by the Contractor	Managing the supply of goods and services to the Club	For the legitimate interests in ensuring the efficient operation of the Club.

Employee's name address telephone number and email address, age, sex, joining date, job description, length of service, salary and other benefits, holiday entitlement, and notice period.	Managing the relationship with employees, as required by employment law.	For the legitimate interests in ensuring the efficient operation of the Club
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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 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 Club class representatives, 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. We will hold your personal data on our systems for as long as you are a member of the Club, for a period of 18 months after you have ceased to be a member and for as long afterwards 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. 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 Manager at Itchenor Sailing Club, Itchenor, Chichester PO20 7AG or office@itchenorsailingclub.co.uk

Approved by ISC General Committee 26-Jan-18

To be reviewed no later than Dec 2020