**BANFF SAILING CLUB DATA 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 banffsailingclub.co.uk 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). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

1. **Who are we?**

2.1 We are Banff Sailing Club. We can be contacted at secretary@banffsailingclub.co.uk.

1. **What information we collect and why.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of information** | | **Purposes** | | **Legal basis of processing** | |
|  | |  | |  | |
| Member's name, | | Managing the Member’s | | Performing the Club’s contract with | |
| address, telephone | | membership of the Club. | | the Member. | |
| numbers, e-mail | |  | |  | |
| address (es). | |  | |  | |
|  | |  | |  | |
| The Member’s name, | | Managing race entries | | For the purposes of our legitimate | |
| boat name and sail | | and race results. | | interests in holding races for the | |
| number | |  | | benefit of members of the Club. | |
|  | |  | |  | |
|  | | Sharing race results with | | For the purposes of our legitimate | |
|  | | other clubs, class | | interests in promoting the Club. | |
|  | | associations, and the | |  | |
|  | | RYA, and providing race | |  | |
|  | | results to local and | |  | |
|  | | national media. | |  | |
|  | |  | |  | |
| Photos and videos of | | Putting on the Club’s | | Consent. We will seek the | |
| Members and their | | website and social | | Member’s consent on their | |
| boats | | media pages and using | | membership application form and | |
|  | | in press releases. | | each membership renewal form | |
|  | |  | | and the Member may withdraw | |
|  | |  | | their consent at any time by | |
|  | |  | | contacting us by e-mail or letter. | |
|  | |  | |  | |
| The Member’s name | | Passing to the RYA for | | For the purposes of our legitimate | |
| and e-mail address, | | the RYA to conduct | | interests in operating the Club and | |
| whilst a current | | surveys of Members and | | / or the legitimate interests of the | |
| member and for up to | | former members of the | | RYA in its capacity as the national | |
| [a year] after ceasing to | | Club. See paragraph | | body for all forms of boating. | |
| be a member of the | | 5.3 below. | |  | |
| Club | |  | |  | |

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|  |  |  |
| --- | --- | --- |
| Name, e-mail address | Information published on | For the purposes of our legitimate |
| and telephone number | Club’s website, in Club’s | interests in operating and |
| of each Club Officer | newsletter and other | promoting the Club |
|  | publications, in the |  |
|  | Club’s marketing |  |
|  | materials and made |  |
|  | available to the RYA, in |  |
|  | each case as a point of |  |
|  | contact at the Club |  |
|  |  |  |
| Name, e-mail address | Information published on | For the purposes of our legitimate |
| and telephone number | Club’s website | interests in operating and |
| of each Club committee |  | promoting the Club |
| member |  |  |

1. **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.

1. **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 we are required to do so by law or as set out in the table above or in 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). 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 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.

1. **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 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.

1. **Your rights**

7.1 You have rights under the GDPR:

1. to access your personal data
2. to be provided with information about how your personal data is processed
3. to have your personal data corrected
4. to have your personal data erased in certain circumstances
5. to object to or restrict how your personal data is processed
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:

Website

https://ico.org.uk/concerns/

Telephone

0303 123 1113.

Contact Address

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 secretary@banffsailingclub.co.uk. [BSC Data Protection Manager]