

PILKINGTON SAILING CLUB



DATA PROTECTION POLICY

VERSION 1.1 – 25.05.18

1 About this Policy

- 1.1 This Data Protection Policy (the Policy) explains when and why we collect personal information, how we use it, 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 the Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend the Policy from time to time without prior notice. You are advised to check our website (<http://www.pilkingtonsailingclub.co.uk>) for the latest version (any amendments will never be retroactive).
- 1.4 The Policy is effective from 25 May 2018. We will always comply with the General Data Protection Regulation (GDPR) and any other UK data protection laws 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 personal data we hold about you.

2 Who we are

- 2.1 We are Pilkington Sailing Club. For the purposes of the Policy we can be contacted by e-mail to membership@pilkingtonsailingclub.co.uk or for subject access requests and breaches **only** to data@pilkingtonsailingclub.co.uk N.B. the second e-mail address forwards to all members of the General Committee.

3 What information we collect and why

- 3.1 **Non-members:** We organise taster sessions for non-members to experience sailing and possibly then sign up to a future course at our Training Centre. We

collect information about name, email address, emergency contact and postal address from such non-members. For those under 18 we also collect information about their age and details of their responsible adult. This is needed during the event and afterwards in case of accident. We also like to use the contact information to promote club membership and training activities. It is possible to opt out of being contacted for those promotional purposes.

We collect names, e-mail addresses, sometimes addresses and, for those under 18, ages of those who express an interest in a future beginner's course but who are not yet club members.

We maintain contact details for kindred sailing clubs, including the names of their officers.

We run a monthly 100 club and keep records of participants and winners. Winners are published on the club notice board and on the club website. We keep details of subscriptions and bank details of 100 club members to enable payment of winnings. We also keep records of 100 club members' addresses and e-mail to communicate with them about the 100 club.

3.2 Club Members (including temporary members): Via initial membership forms, renewal forms and associated documents we collect information about name, address, age (if under 25), and a phone number and e-mail address for each member (or group of members in the case of family members). We use the e-mail addresses for mass mailings about club matters and newsletter circulation. You can opt out of newsletter circulation by notifying us.

We also maintain information about their class of membership, whether and how and when they paid their subscription. These records are kept for a maximum of 6 years.

For every member we keep a record of their permission to use their personal data and a separate record of their explicit permission (or not) to use their image.

We keep temporary records of those attending club events and keep records of when and how much they have paid.

For members owning boats we keep a copy of their current insurance declaration and information concerning the class and sail number of their boat(s) and the whereabouts of any property they have left on club premises.

We keep a record of who has which returnable trophy so we can get them back.

We keep records of any incidents involving injury or a near miss.

We keep records of any complaints made.

We mention club members in committee minutes and general meeting minutes.

Club members may be nominated for RYA or local sports council awards.

Club members may be identified in insurance claims made by the club

- 3.3 **Those who race (including visitors):** We keep records of boat number and class, crew names and lap and final position for each race entered. This is used to see who is participating and to allocate trophies and other club awards.

The results are posted on the club noticeboard.

Results are also published on the club website for public view.

Race results information without boat numbers but with boat class is provided to the RYA for their handicap review exercise and published by the RYA under the club name.

- 3.4 **Duty volunteers:** We provide an e-mail address and suggested duty dates for competent members volunteering to perform race officer and safety boat duties to the external Dutyman system. Publication of your information by that organisation is then subject to your control via an e-mail they send to you and subsequent settings control you will have for your account.

- 3.5 **Instructors and Helpers:** All volunteers working with children or vulnerable adults are subject to safeguarding considerations. We collect and process either a self-declaration of fitness or a full volunteer DBS check done via the RYA. If you have a criminal conviction we will need to satisfy ourselves that it is not relevant before you can work as an instructor or helper.

We keep records of training undertaken for volunteer roles. We keep copies of first aid certificates, and RYA certificates for instructors. We aim to keep records of all volunteer work members perform.

- 3.6 **Beginners:** In addition to the information needed to become a club member we also keep a record of any medical (or other) condition that you tell us may be relevant to the activity.

We keep a record of course attendance and your award. We also supply basic information about you to the RYA. We take photographs of beginner activities and publish them on our website from time to time in line with image permissions noted above in 3.2.

- 3.7 **Those claiming expenses:** We keep information about your bank account to enable BACS payments. A record of the payments is also kept. This information is known only to the treasurer.

- 3.8 **Those responsible for financial decisions:** Because the club is registered as a CASC we keep a record that all members of the General Committee are “fit and proper persons” within the meaning of the Charities Act.

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 an appropriate online secure payment system.
- 4.5 We will notify you promptly, normally by e-mail, in the event of any known breach of your personal data.

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 above or paragraph 5.2 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 or run rota and other data management services). However, we disclose only the personal data that is necessary for the third party to deliver the service and we would have a contract in place that requires them to keep your information secure and not to use it for their own purposes whenever this type of service is used.

6 How long do we keep your information?

- 6.1 We will hold your personal data on computer systems or as paper records for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. Typically that is 6 years. Committee minutes are retained for 10 years. If you leave the Club 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.
- 6.3 We will complete an annual audit of all personal data held of the Club's membership and destroy all records no longer required. This audit will be repeated after membership renewals are completed and minuted in the Club records.

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
 - 7.1.7 Please direct all withdrawal of data consent matters to membership@pilkingtonsailingclub.co.uk with an explanation about exactly which consent you are withdrawing.
- 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

We welcome stakeholder involvement in the evolution of this data protection policy. If you have any questions, comments or requests regarding our data processing practices please send them to our Data Protection Manager, the Club Membership Secretary at:

membership@pilkingtonsailingclub.co.uk