



## **DATA PRIVACY POLICY**

### **1.0 Background.**

- 1.1 This is the Data Privacy Policy of Cargreen Yacht Club Limited, Coombe Lane, Cargreen, Saltash, PL12 6PB.
- 1.2 We are required to ensure that our Data Privacy Policy complies with the General Data Protection Regulations (GDPR) which will come into effect in May 2018.
- 1.3 Our Data Protection Manager is Nick Fox and can be contacted by email at this address - [webmaster@cycadmin.org](mailto:webmaster@cycadmin.org).

### **2.0 About this policy.**

- 2.1 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.
- 2.2 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.
- 2.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website ([www. cagreenyc.org](http://www.cagreenyc.org)) or our Club noticeboard regularly for any amendments.
- 2.4 We will always comply with the GDPR when dealing with your personal data. Further details about the regulations can be found on the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

### **3.0 The information we collect.**

- 3.1 The information that we keep has all been provided by you in relation to membership application and renewal and, if applicable, to mooring and facility allocation and renewal and includes the following:
  - 3.2 Name.
  - 3.3 Date of birth.
  - 3.4 Gender.
  - 3.5 Address.
  - 3.6 email address.
  - 3.7 Username and password for website access.
  - 3.8 Telephone Number(s)
  - 3.9 Membership Secretary Notes
    - a) Skills, qualifications and experience
    - b) Membership number and type
  - 3.10 Moorings Officers Notes
    - a) Mooring number and details of other facilities (if allocated)
    - b) Boat name, sail number, SSR no. and boat specifications
    - c) Tender identification mark
  - 3.11 Treasurer’s Notes
    - a) GoCardless Direct Debit reference number and date created
    - b) Record of financial transactions with the Club, subscriptions and fees
  - 3.12 Cadet’s Notes
    - a) Details of any medication, allergies or medical treatment

- b) Special assistance requirements.
- c) Swimming ability.
- d) Facebook profile.

3.12 Photographs of Club activities which may include members and/or their boats

#### **4.0 How we hold Data.**

4.1 Data about you is held on electronic databases and in paper form.

4.2 Cadet data is held in paper form only.

#### **5.0 The purposes for which we hold data.**

5.1 To manage the member's membership of the Club.

5.2 To have an understanding of the age and gender demographic of the Club for future development purposes.

5.3 To have an understanding of the skills and qualifications and experience of members in order to assist in selection of managers and officers of the Club.

5.4 To manage duty rosters such as Boatwatch

5.5 For the purpose of allocating moorings and other clubs facilities, managing the mooring operation, raising relevant fees and managing the Boatwatch operation.

5.6 To make reports to the RYA and the Community Amateur Sports Council.

5.7 For managing entries to and results of Challenges, Races and Regattas and to share results with other clubs, class associations, and the RYA and the provision of results to local and national media.

5.8 To post images to the Club's website.

5.9 To promote Club events within the membership.

5.10 Cadets health and ability information for attending to your child's safety in case of sickness or Emergency whilst they are on the Club premises.

5.11 Cadet parents Facebook profile for communication on closed Facebook group.

5.12 Cadet RYA Youth Scheme progress.

#### **6.0 The legal basis of processing.**

6.1 To deliver the Club's contract with the member.

6.2 For the purposes of our legitimate interests in operating the Club.

6.3 For the purposes of the legitimate interests of the RYA in its capacity as the national body for all forms of boating.

6.4 To ensure that we can provide sufficient facilities (including changing rooms and toilets) for each gender.

6.5 For the purposes of our legitimate interests in holding Challenges, Races and Regattas.

6.6 For the purposes of our legitimate interests in promoting the Club.

6.7 Cadets health and ability and any other information obtained or provided during the course of your application will be used solely for the subjects' vital interests and medical purposes.

#### **7.0 How we protect your personal data**

7.2 We will not transfer your personal data outside the EEA without your consent.

7.3 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.

7.4 Please note however that where you are transmitting information to us over the Internet this can never be guaranteed to be 100% secure.

7.5 For any payments which we take from you online we will use a recognised online secure payment system.

7.6 We will notify you promptly in the event of any breach of your personal data which might expose you to too serious risk.

7.7 Cadet Health Declaration & Parental Consent forms are held in a secure file box at the club.

## **8.0 Access to the information you provide us.**

- 8.1 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 8.2 below
- 8.2 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. We will disclose only the personal data that is necessary for the third party to deliver the service and when we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

## **9.0 Retention of data.**

- 9.1 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 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 may retain your personal data for up to two years in an archived form in order to be able to comply with future legal obligations.
- 9.2 We securely destroy all financial information once we no longer need it.
- 9.3 Cadet Health Declaration & Parental Consent forms are destroyed by shredding at the end of each season. New records will be created at sign up each year, or as requested by the Cadet or Guardian due to medical or personal circumstances.

## **10.0 Your rights.**

- 10.1 You may withdraw your consent at any time by notifying the Club in writing.
- 10.2 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.
- 10.3 You should be aware that if you withdraw your consent or take either of steps d) or e) that this may impact on how the Club can manage its relationship with you and could result in termination of membership.

## **11.0 Who to contact about your personal data.**

- 11.1 If you wish to see your data or exercise any of the rights in 10.0 above or make a complaint about how we have handled your personal data please contact an Officer of the Club

## **12.0 Making a complaint to the Information Commissioners Office.**

- 12.1 If you are not satisfied with how we have handled your complaint, 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 Commissioners Office

Wycliffe House

Wilmslow

Cheshire

SK9 5AF