



## **DATA PRIVACY POLICY**

### **1 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 Peter Plume and can be contacted by email at this address - [memsecretary@cycadmin.org](mailto:memsecretary@cycadmin.org).

### **2 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 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:

Skills, qualifications and experience  
Membership number and type

### 3.10 Moorings Officers Notes:

Mooring number and details of other facilities (if allocated)  
Boat name, sail number, SSR no. and boat specifications  
Tender identification mark

### 3.11 Treasurer's Notes :

GoCardless Direct Debit reference number and date created  
Record of financial transactions with the Club, subscriptions and fees

### 3.12 Cadet's Notes: Information being provided with explicit consent by parents on the Cadet Membership & Health Declaration and Parental Consent Form in Box number:-

BOX 1: Details of any medication, allergies or medical treatment (Special Category Data)

BOX 2: Details of special assistance or some form of reasonable adjustment to be able to take part in cadets (Special Category Data)

BOX 4: Swimming ability.

BOX 5: Explicit consent for photographs or video

BOX 7: Social Media closed group (Facebook) profile of parents or of cadet, if of age.

3.13 Photographs of Club activities which may include members and/or their boats. Explicit permission optional on Club Membership Form. This is for photographs published by the club in any form only. Photographs published by members cannot be controlled.

## 4 **How we hold data.**

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

4.2 Cadet Membership Forms with possible Special Category Data are only held in paper copy in a locked file box held in the Cadet Cupboard. Cadet details are NOT stored in the Club electronic database..

## 5 **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.

5.7 To share data with the RYA in order for them to commission surveys of members and former members (the latter for up to two years after leaving the Club) see section 8.3 below.

5.8 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.

5.9 To post images to the Club's website.

5.10 To promote Club events within the membership.

5.11 Cadet Membership & Health Declaration and Parental Consent Forms, BOX 1 & 2 with possible Special Category Data provided expresses explicit consent for attending to your child's safety in case of sickness or Emergency whilst they are taking part in club activities or communication about club activities.

5.12 Cadet parents or cadets social media profile if of age, for communication on closed social media group.

5.13 To allow the instructors to record the individual cadet progress through the RYA Youth Scheme.

## **6 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. For the purposes of our 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

6.7 Cadet Membership & Health Declaration and Parental Consent Forms, BOX 1&2 with possible Special Category Data provided during the course of your application will be used solely for that individual Cadets' vital interests and medical purposes, whilst undertaking club activities.

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

7.1 It is law that your personal data cannot be transferred outside the European Economic Area (EEA) unless that country or territory provides a suitable level of protection for data. It is the intention for Club data to stay within the EEA.

7.2 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.

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

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

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

7.6 Cadet Membership & Health Declaration and Parental Consent Forms with possible Special Category Data are only available to the Cadet Officer, Cadet Officer Assistant, Training Officer, RYA Qualified instructors, in case of emergency any person / organisation listed on the CYC Emergency Plan available on the notice board e.g. RYA legal.

## **8 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 written consent (which you are free to withhold) except where required to do so by law or as set out in 8.2 and 8.3 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.

8.3 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.

## **9 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 ten years in an archived form in order to be able to comply with future legal obligations. In the case of email correspondence this will be deleted after two years.

9.2 We will securely destroy all financial information once we no longer need it.

9.3 Cadet Membership Forms with possible Special Category Data 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 Your rights**

10.1 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.

10.2 You should be aware that if you 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 **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 email an Officer of the Club

## 12 **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