

STARCROSS YACHT CLUB

DATA PRIVACY POLICY

1. About this Policy

1.1 This policy explains when and why we collect personal information about our members, how we use it, how we keep it secure and your rights in relation to it.

1.2 We 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 the club website for any amendments.

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, Starcross Yacht Club will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are **Starcross Yacht Club**. Contact details for the club can be found at <https://www.starcrossyc.org.uk/contacts>

3. What information we collect and why.

The GDPR requires us to state the legal bases on which we process your data (further information on this can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>)

These are detailed in the table;

Ref	Type of information	Purposes	Legal basis of processing
1	Member's title, name, address, telephone number(s), and e-mail address. Includes additional persons including Juniors under Family memberships	Managing the Member's membership of the Club. Managing the duty roster.	Performing the Club's contract with the Member, and for the purposes of our legitimate interests in operating the Club.

Ref	Type of information	Purposes	Legal basis of processing
2	Age group declaration	<p>Managing membership categories which are age related</p> <ul style="list-style-type: none"> • Juniors (under 18, or under 25 and in full time education) • Seniors (over 65 and with 10 year membership) <p>The commercial system used to manage membership (WebCollect) includes a date of birth field, but the member is not obliged to complete this.</p>	Performing the Club's contract with the Member.
3	Occupation	It is helpful for management of the Club to understand the skillsets available within the membership, as the club relies in part on volunteers to run the club and keep costs down.	Consent. There is no obligation to declare occupation on the membership form.
4	The Member's boat class, sail number and other relevant identifying features	<p>Allocating and managing spaces in the Dinghy Park.</p> <p>Managing race entries and race results.</p> <p>Sharing race results with other interested parties such as Class Associations, the RYA, and local and national media.</p>	<p>For the purposes of our legitimate interests in operating the Club efficiently.</p> <p>For the purposes of our legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p>
5	Photos and videos of Members and their boats during organised racing and training events.	<p>Publication on the Club's website, social media pages and using in press releases.</p> <p>To provide effective training. Images captured for this purpose will be deleted at the end of the event.</p>	Consent. We will seek the Member's consent on race entry forms and training bookings.

Ref	Type of information	Purposes	Legal basis of processing
6	The Member's name, e-mail address and telephone number	<p>Creating and managing the Club's online Membership Directory in DutyMan.</p> <p>The member may elect to provide e-mail address and/or telephone number</p>	<p>Consent. We will seek the Member's consent to be included in the directory on their membership application form.</p> <p>The Member may withdraw their consent at any time by contacting us by telephone, e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.</p>
7	The Member's name, telephone number(s), and e-mail address after they have left the club.	<p>To enable a waiver on a re-joining fee if the member formally advised they were leaving (referred to as a "resigned" membership)</p> <p>To ensure keys are returned.</p> <p>To enable the club to monitor membership trends over time</p>	For the purposes of our legitimate interests in operating the Club
8	Names and telephone number of Club Officers and Fleet captains	<p>Published on the Club's website</p> <p>Some are made available to the RYA as a point of contact at the Club</p>	For the purposes of our legitimate interests in operating and promoting the Club
9	Name and e-mail address	<p>Held on the Club's website to enable members to access facilities and information that is only available to members.</p> <p>More information as to personal data is used on the website can be found at; https://www.starcrossyc.org.uk/terms-conditions</p>	<p>Consent. The member consents to this by requesting a website logon.</p> <p>Members are not required to have a website logon and may withdraw consent at any time.</p>
10	Alternative contact name	On the berthing form to provide the Berth Marshall with an alternative contact if the owner of a boat cannot be contacted.	Consent. The member is not obliged to provide this information.

Ref	Type of information	Purposes	Legal basis of processing
11	Name, contact number, e-mail address and emergency contact details of members and non members.	Participation in certain sailing events e.g. Open meetings, and Junior Training. Mainly electronic, but some events still use paper forms. Contacting next of kin in the event of emergency.	For the purposes of our legitimate interests in operating the Club by protecting the Member's vital interests and those of their dependants
12	Ages of Junior members under 16 who undertake Powerboat training	The club needs to identify anyone under 16 at the time of the course because they need to have their certificate endorsed.	For the purposes of our legitimate interests in operating the Club.

4. How we protect your personal data

4.1 The club uses commercial service providers located within the UK to store and process your personal data. For the purposes of the GDPR these are data “processors” with whom we hold contracts that ensure the safety of your personal data;

- **WebCollect** –used to administer your membership and berthing
- **DutyMan** – used to administer the duty rosters
- **linode.com** – hosts the Club Website which includes name and e-mail address to enable members to logon to use member only functionality
- **linode.com** - hosts Race Manager which is used to run racing at the club
- **linode.com** - hosts Club Manager which was used prior to WebCollect to administer membership and berthing.

4.2 These organisations have implemented generally accepted standards of technology and operational security in order to protect your personal data from loss, misuse, unauthorised alteration or destruction.

4.3 For any payments we take from you online, we will use a recognised online secure payment system. As of June 2018 (other than bank transfers for membership applications and renewals), the club does not take any form of on-line payment although this may change in future. The club does not store any of your financial data.

4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk. The club has a Data Breach Procedure and will always comply with the ico requirements for dealing with data breaches. More information on this can be found on the ico website (see 1.4. above)

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data.

5.2 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

5.3 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 send you printed 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.

5.4 If our third parties providers engage other sub processors to process your data, they will be required to have contractual arrangements with their sub-processors that ensure your information is kept secure and not used for their own purposes.

5.4 If you have completed a course at the club that entitles you to an RYA qualification, your name will be passed to the RYA so that you can be issued with the relevant certificate

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 and for as long afterwards as necessary to comply with our legal obligations

6.2 When members leave the club a subset of personal data sufficient only to identify you as an individual is kept to enable any future concessions to be provided to you. This is currently restricted to a waiver of the joining fee for resigned members who elect to rejoin at a later date

6.3 We will review your personal data annually 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 any legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.4 Paper records in respect of members who elect to use a paper form to apply for and renew their membership are kept until their membership application has been approved and entered into the membership system (or their renewal processed

6.5 Paper race entry forms are destroyed as soon as is practical after the event has finished.

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/>

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel; 0303 123 1113.

8 Subject Access Requests

8.1 You may contact the Membership Secretary at any time to exercise your rights as laid out in section 7 above.

8.2 You can also logon to your WebCollect account at any time to view the personal data the club holds about you (and where applicable your Family members) in respect of your membership. Use your e-mail address to logon to WebCollect at [WebCollect Logon](#)

8.3 You can also logon to your DutyMan account at any time to view the personal data the club holds about you in respect of your duty roster commitments. Each family member will have a separate logon. Use your name and surname e.g. John Smith to logon to DutyMan at [DutyMan Logon](#)

8.4 If you have forgotten your password, the systems allow you to reset these on-line.

9 Further Information

For further details, please address any questions, comments and requests regarding our data processing practices to the Membership Secretary (contact details are on the Club Website).

Document Control

Version	Date	Notes	Author
1.0	25 th May 2018	Initial version to comply with GDPR	Steve Peat