



Welcome to Burghfield Sailing Club's Privacy Policy

Introduction

The General Data Protection Regulation or GDPR, comes into effect as of **25th May 2018**. The aim of this legislation is to protect us all from privacy and data breaches within an increasingly data-driven world.

The main changes that GDPR brings are:

- **Increased scope** - it affects all organisations operating within the EU, irrespective of where they are based
- **Increased penalties** for data breaches and non-compliance
- **Strengthening of consent** – i.e. providing you with clear information before you share your data and greater ease of withdrawing consent
- **Easier access** to your data

The Club holds personal data to meet your requirements for Club membership, for the purposes of our legitimate interests in operating the Club, managing race entries and results, to keep you informed of any events and to send you information pertaining to the Club.

The lawful basis to hold this information is to provide annual membership to Burghfield Sailing Club. The Club will process and protect data in accordance with the terms of the General Data Protection Regulation. Any data held within the organisation will be held for the benefit of the member and effective management of the organisation. We do not pass, sell or trade the information for profit or gain.

You have the right to access any data we hold about you and you can request the removal of this data once your membership has ceased.

All data held at the club is password protected and secure and the Club undertakes reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

Burghfield Sailing Club respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you join the club and tell you about your privacy rights and how the law protects you.

1. About this Privacy Policy

- 1.1. This policy explains when and why we collect personal information about our members, 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 www.burghfieldsailing.org or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively). It is important that the

personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

- 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.

2. About Us

- 2.1. We are Burghfield Sailing Company Ltd. This privacy policy is issued on behalf of Burghfield Sailing Club so when we mention “Burghfield Sailing Club”, “we”, “us” or “our” in this privacy policy, we are referring to the company responsible for processing your data.

- 2.2. Contact Details:

Legal Entity: Burghfield Sailing Company Ltd

Postal Address: Hangar Road, Theale, Berkshire, RG45 6RX

Email Address: info@burghfieldsailing.org

3. The Data We Collect About You

- 3.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

- 3.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, title, date of birth and gender. It also includes boat and craft details & sail numbers.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account.
- Transaction Data includes details about payments to and from you relating to services you have purchased from us.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- 3.3. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Managing the duty roster.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member.

Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
The Member's name, boat name and sail number	Managing race entries and race results. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media. Allocating compound spaces.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club. For the purposes of our legitimate interests in promoting the Club. For the purposes of our legitimate interests in operating the Club
	Putting on the Club's website and social media pages and using in press releases.	Consent. We will seek the Member's consent on their membership application form and each event/activity form and the Member may withdraw their consent at any time by contacting us by e-mail or letter.
Photos and videos of Members and their boats	Use of images for Race Management purposes	For the purposes of our legitimate interests in order to fulfil our contract of providing fair racing. We will not use them publicly without consent.
	Creating and managing the Club's online Duty rosters.	For the purposes of our legitimate interests in operating the Club. The Member may update their public profile at any time by updating their details through the online software.
The Member's name and e-mail address and telephone number's	Creating and managing the Club's online Duty rosters.	For the purposes of our legitimate interests in operating the Club. The Member may update their public profile at any time by updating their details through the online software.
The Member's name and e-mail address, whilst a current member and for up to 2 years after ceasing to be a member of the Club, or until all boats/craft have been removed from site	Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club. See paragraph 5.3 below.	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.

Name, e-mail address and telephone number of each Club Officer	Information published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the RYA, in each case as a point of contact at the Club	For the purposes of our legitimate interests in operating and promoting the Club
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website	For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers

4. How We Collect Your Data

4.1. Direct Interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- 4.1.1. apply for club membership
- 4.1.2. apply for Oppie Club or Sailability membership
- 4.1.3. update your membership records – boat / craft
- 4.1.4. attend/enter an event or activity
- 4.1.5. enter a race series
- 4.1.6. request reimbursement of club expenses

4.2. Third parties. We may receive personal data about you from various third parties as set out below:

- 4.2.1. Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Webcollect and goCardless.
- 4.2.2. Contact Data from our rostering software - Dutyman
- 4.2.3. Marketing and Communications Data from one of our communication services such as Mailchimp.

5. How We Protect Your Personal Data

5.1. We will not transfer your personal data outside of the club without your consent

5.2. 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.

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

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

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

6. Who Else Has Access to the Information You Provide to Us?

6.1. 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 6.2 and 6.3 below.

6.2. 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.

6.3. 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.

7. How Long Do We Keep Your Information?

7.1. 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 Club's 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.

7.2. We securely destroy all financial information once we have used it and no longer need it.

8. Your Rights

8.1. The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

8.2. 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

8.3. For more details, please address any questions, comments and requests regarding our data processing practices to info@burghfieldsailing.org