



East Lancashire Sailing Club
Data Protection Policy

Version: 1.0





CONTENTS

1	Document version control	2
2	The Scope of this Policy	2
3	Who are 'We'?	2
4	About this Policy	3
5	What personal data do we collect and why?.....	3
6	How do we protect your personal data?	5
7	Who else has access to your personal data?	5
8	How long do we keep your personal data?	5
9	What are your rights?	6

1 DOCUMENT VERSION CONTROL

DATE	VERSION	NAME	REASON FOR CHANGE
20/02/2018	0.1 Draft	Michael Ryding	Document creation and draft for initial review
21/02/2018	1.0	Michael Ryding	First published version

2 THE SCOPE OF THIS POLICY

The East Lancashire Sailing Club (ELSC) is affiliated to the Royal Yachting Association (RYA) and is also a Recognised Training Centre (RTC). This policy applies to both the Sailing Club and the RTC with regards to data collection, use, storage and destruction.

3 WHO ARE 'WE'?

We are the East Lancashire Sailing Club and we can be contacted at:

East Lancashire Sailing Club
Rishton Reservoir,
Rishton,
Lancashire,
BB1 4ET
email: info@sail-elsc.org.uk

4 ABOUT THIS POLICY

This policy explains when and why East Lancashire Sailing Club (“we”) collect personal data about members and instructors, how we use it, how we keep it secure and your rights in relation to it.

We may collect, use and store your personal data, as described in this Data Protection Policy and also as explained on application forms etc. when we collect the data from you.

We reserve the right to amend this Data Protection Policy from time to time without prior notice to fulfil our legal obligations. As such you are advised to check our website (sail-elsc.org.uk) regularly, for any amendments. However, we will not make any amendments retrospectively.

We will always comply with the General Data Protection Regulations (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, and our RTC Principle will be our Data Protection Manager.

5 WHAT PERSONAL DATA DO WE COLLECT AND WHY?

INFORMATION	PURPOSE	REASON FOR PROCESSING
Member’s name, address, telephone number and email address	Managing the membership of the Sailing Club	To carry out the contract we have with a member and for the legitimate interests in operating the Sailing Club
The names and ages of family members	Managing the family membership of the Sailing Club	To carry out the contract we have with a family member and for the legitimate interests in operating the Sailing Club
Emergency contact details	Contacting next of kin in the event of an emergency	Protecting the member’s vital interests and those of their dependents
Age related information	Managing membership categories which are age related	To carry out the contract we have with a member and for the legitimate interests in operating the Sailing Club
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
	Anonymised (aggregate) reporting to the RYA	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils

INFORMATION	PURPOSE	REASON FOR PROCESSING
Members name, boat name and sail number	Managing race entries and race results	For the purposes of our legitimate interests in holding races for the benefit of members of the Club
	Sharing aggregated race results with the RYA, and class associations and providing race results to the media.	For the purposes of our legitimate interests in supporting the RYA and promoting the Club.
	Allocating dinghy park berths.	For the purposes of our legitimate interests in operating the Club
Photos and videos of members and their boats	For use on the Sailing Club's website and social media pages and using in local and national press releases	We will seek the Member's consent on their membership application form and the Member may withdraw their consent at any time by contacting us by e-mail or letter. In respect of Junior Members we will seek parental consent annually and consent can be withdrawn at any time by contacting us by e-mail or letter.
Contractor's name, address, email addresses and telephone numbers and details of the goods and services offered by the Contractor	Managing the supply of goods and services to the Club	For the legitimate interests in ensuring the efficient operation of the Club.
Bank account details of any member or contractor making payment to or receiving payment from the Sailing Club	For members to recover expenses from the Sailing Club For the refund of monies paid to the Sailing Club, for example cancelled course, overpayment etc. For the Sailing Club to pay contractors' invoices for works	Performing the Club's contract with the Member, students, and engaged contractors.
Member's qualifications. For example RYA qualifications, Safety Boat and First Aid	To facilitate management of the Sailing Club's duties roster	For the purposes of our legitimate interests of safely operating the Club's activities.
Potential Member's name, telephone number and email address	To inform the potential member of the activities and opportunities at the Club to assist recruitment of potential Members	For the purposes of our legitimate interests in promoting the Club and recruitment of Members.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing training, coaching and other forms of instruction at the club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members
Safeguarding self declaration details for all working with children or vulnerable adults	To comply with Safeguarding legislation and best practice	For the purposes of our legitimate interests in safeguarding children and vulnerable adults at the Club
Accident and near misses personal data.	To review, learn from and take steps to reduce further accidents in the future.	For the purposes of our legitimate interests in safety at the club and defence of potential legal claims

6 HOW DO WE PROTECT YOUR PERSONAL DATA?

We will not transfer your personal data outside the European Economic Area (EEA) without your consent.

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.

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

For any payments which we take or make from or to online accounts we will use a recognised online secure payment system.

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

7 WHO ELSE HAS ACCESS TO YOUR PERSONAL DATA?

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 the table in section 5.

We will aggregate and anonymise data, for example for class associations or the RYA, to assist with their national understanding of sailing activities. This data will not include any information that can be used to identify you as an individual.

8 HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will hold your personal data on our systems for as long as you are a member of the Sailing Club, for a period of 18 months after you have ceased to be a member and for as long as is necessary to comply with our legal obligations.

We will review all personal data (member, potential member, instructor or contractor) every year to establish if we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing this data with exception to date that we need archived to comply with future legal obligations. e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

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

9 WHAT ARE YOUR RIGHTS?

You have rights under the General Data Protection Regulations (GDPR):

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

<https://ico.org.uk/concerns/>

For more details, please address any questions, comments and requests regarding our data processing practices to:

Data Protection Manager
East Lancashire Sailing Club
Rishton Reservoir,
Rishton,
Lancashire,
BB1 4ET

info@sail-elsc.org.uk