

## HAVERSHAM SAILING CLUB

### DATA PRIVACY POLICY

Reviewed 11<sup>th</sup> February 2025

#### 1. **About this Policy**

- 1.1 This policy explains when and why we collect personal information about our members, instructors and visitors, 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.havershamsc.org](http://www.havershamsc.org) or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 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's Office ([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.

#### 2. **Who are we?**

- 2.1 We are Haversham sailing Club. We can be contacted at

Haversham Sailing Club,

24 High Street,

Haversham,

Milton Keynes

MK19 7DX

*Phone:* 01908 225657

*Email:* [mail@havershamsc.org](mailto:mail@havershamsc.org)

### 3. What information we collect and why.

	Data Usage Title	Type of information	Purposes	Legal basis of processing	Retention	Data Management Information	Protection Level / Risk
3.1	Membership	Member's name, address, telephone numbers, e-mail address(es). Including all the details supplied about members who are within a Family Membership	Managing the Member's membership of the Club. Managing the duty roster. Keeping in touch with the Member.	Performing the Club's contract with the Member For the purposes of our legitimate interests in operating the Club.	3 years after member leaves the club.	Haversham Documents on Google Drive. Restricted access	High
3.2	Membership	The names and ages of the Member's dependants	Managing membership categories which are age related - Junior programme. activity planning	Performing the Club's contract with the Member.	3 years after the member leaves the club	Haversham Documents on Google Drive. Restricted access	High
3.3	Membership	Gender	Demographic statistics Provision of adequate facilities for members.  Reporting information to the RYA.	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.  For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.	3 years after the member leaves the club		Low

	<b>Data Usage Title</b>	<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>	<b>Retention</b>	<b>Data Management Information</b>	<b>Protection Level / Risk</b>
3.4	Any Junior Activity/Junior Week/Course	Junior Emergency Contact Details Relevant Medical information supplied by parent	Contacting the next of kin in an emergency and ensure medical care	Protecting the Club's contract with the Member.	Duration of Junior week or course	Haversham Documents on Google Drive. Restricted access. Paper copies,	High
3.5	Financial	Bank account details of the member or other person making payment to the Club	Managing the Member's and their dependants' membership of the Club, the provision of services and events.	Performing the Club's contract with the Member	3 years membership data 5 years Tax records 6 years VAT records	Treasurer held files	High
3.6	Racing	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	Max 5 years	Results Secretary	Low
3.7	Racing	Members name, boat name and sail number	Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.	For the purposes of our legitimate interests in promoting the Club.	Max 5 years	Results Secretary	Low
3.8	Open Meetings, Events and Regattas	Visitor's name and contact details	Managing race results and prize giving. Sharing results with the class association. Informing the individual of similar Open Meetings Regattas or Events	For the purposes of our legitimate interests in holding races.	1 year	Information saved securely on Jot form	Low

	<b>Data Usage Title</b>	<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>	<b>Retention</b>	<b>Data Management Information</b>	<b>Protection Level / Risk</b>
3.9	Boat and other equipment storage	Members name, boat name and sail number	Allocating berths and compound spaces.	For the purposes of our legitimate interests in operating the Club	3 years after the member leaves the club	Haversham Documents on Google Drive.	Low
3.10	Multimedia	Photos and videos of members and their boats as well as other club activities	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 membership renewal form, and the Member may withdraw their consent at any time by contacting us by e-mail or letter.	1 year (term of consent)	Multimedia files should only be shared behind password-protected firewalls on the club website or Facebook page, or under the direct supervision of specific club officers. Additionally, special care should be taken when handling multimedia files containing images of children.	Medium
3.11	CCTV	Video	The site's security protocols including monitoring visitors for safety purposes.	Legitimate interest to ensure the monitoring for safety, protecting individuals and property.	As per the CCTV Policy	As per the CCTV Policy	Medium

	<b>Data Usage Title</b>	<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>	<b>Retention</b>	<b>Data Management Information</b>	<b>Protection Level / Risk</b>
3.12	WhatsApp	Information sharing including pictures and other multimedia	The sharing of information and multimedia files to enhance communication between the membership.	Members consent to be part of WhatsApp groups by supplying their consent and phone number to the group's admin.	1 year (term of consent)	Club WhatsApp Groups held by admin with restricted access	Medium
3.13	Open Day Visitors	Name, Address, Contact Details, Previous Sailing Experience, Photo Permission, Age if Under Eighteen.	Open Day visitors' Insurance, Managing risk.	Insurance, Consent, Legitimate Interests in promoting the Club.	48 hours	Paper copies, demographic data captured for records and marketing	Low
3.14	RYA Data	Demographic data to the RYA	Passing to the RYA for the RYA to conduct surveys of members of the Club (and members of other clubs affiliated to the RYA). The surveys are for the benefit of the Clubs (and other clubs) and / or the benefit of the RYA.	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	1 year	Demographic data only	Low

	Data Usage Title	Type of information	Purposes	Legal basis of processing	Retention	Data Management Information	Protection Level / Risk
3.15	Trainers /Instructors	Instructor's / Trainer's name, address, email addresses, phone numbers and relevant qualifications and/or experience data processed by the Club.	Managing instruction at the Club. Managing club volunteers "Qualified people"	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members	3 years after the member leaves the club	Data held for qualification management purposes held in Club databases.	Medium
3.16	Contact Details of Club Officers	Name, Haversham e-mail address 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	3 years after the member leaves the club	Each officer has club issued email address connected to personal email via club mail account	Low
3.17	Club Suppliers	Representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers	As long as is necessary.	General and financial records	Low
3.18	Complaints, DPA Breaches, and DPA Subject Access Requests	Contact details and data used to verify facts and ensure DPA compliance during an investigation.	The systematic collection of data to support corrective measures if necessary.	For the purposes of our legitimate interests and to comply with legislative requirements in managing the club.	3 years	Undertake the following unless any legal action is still pending: - Remove all data and correspondence files. Delete all electronic records and correspondence, Destroy all paper copies.	High

	<b>Data Usage Title</b>	<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>	<b>Retention</b>	<b>Data Management Information</b>	<b>Protection Level / Risk</b>
3.19	Visitors to the club	Name of visitor and name of the club member who is sponsoring their visit	Recording visitors to the club	Monitoring non-members visits are in accordance with the Club rules.	1 year	Information collected by QR code displayed in the clubhouse. Data stored securely with restricted access on JotForm	Low

#### **4. How we protect your personal data**

- 4.1 In order to manage your membership of the Club and communicate with you, it may sometimes be necessary for us to transfer your personal data outside the European Union. However, we will only do so in accordance with the GDPR. That is most likely to involve either approval by the EU Commission that the country to which your data is being transferred provides adequate protection for personal data or on the basis of standard clauses, required by the EU, with the organisation to which we are transferring your data.
- 4.2 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.
- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

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

- 5.1 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 the table above or paragraph 5.2 below.
- 5.2 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 (subprocessors) 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.
- 5.3 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.

#### **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 it is in the Clubs' 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.
- 6.2 We securely destroy all financial information once we have used it and no longer need it.
- 6.3 The individual data retention is shown in the table above.

## **7. Your rights**

- 7.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Data Protection Manager ([dataofficer@havershamsc.org](mailto:dataofficer@havershamsc.org)). (a) The right to be informed (knowing how we will use your data). You have the right to be told how we will use your Personal Data – which is set out in This Notice. (b) The right of access (being provided with copies of your data). You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request. (c) The right to rectification (changing incorrect information we hold). If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above. (d) The right to be forgotten (erasure) (requesting deletion of your Personal Data). In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database). (e) The right to restrict processing (limiting how we use your data). In certain situations you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage. [www.rya.org.uk](http://www.rya.org.uk) © Royal Yachting Association Updated: 30 July 2018 Page 8 of 9 (f) The right to data portability (moving your data in a useable format). You have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations. (g) The right to object (when we must stop processing your data). You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims. (h) The right not to be subject to automated decision making including profiling (making a decision solely by automated means without any human

involvement). The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. Haversham Sailing Club does not undertake automated decision making or profiling.

- 7.2 If you believe there has been accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal data, you must report it immediately to the Club Board of Directors. The club is responsible for investigating any potential security breaches and reporting to the enforcement agency if necessary, depending on the severity of the breach. You will be kept informed of the investigation process as well as any corrective and preventative actions undertaken.
- 7.3 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
- 7.4 For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager ([dataofficer@havershamsc.org](mailto:dataofficer@havershamsc.org)).