



# DONAGHADEE SAILING CLUB



## Data Security and Privacy Policy – V1.0

### 1 About this Policy

This policy explains when and why we, Donaghadee Sailing Club, collect personal information about our members, instructors, and others in the normal course of administering membership and running the club. It sets out how we use and protect any information you give us and your rights in relation to it.

We may collect, use and store your personal data, as described in this Security and Data Privacy Policy and as described when we collect data from you.

We may change this policy from time to time as required to consider changes in Legislation and the experience of the policy in practice. You should check our Security and Privacy Policy web page or our club notice board from time to time to ensure that you are happy with any changes.

We will always comply with the [General Data Protection Regulation \(GDPR\) May 2018](#) 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](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 What we collect and why

#### ***2.1 To be able to perform our Club’s contract with our members and for the purposes of our legitimate interests in operating and managing activities of the Club we collect the following information.***

For managing the Member’s, and their dependants’, membership of the Club and for managing the duty roster, we collect and store:

- Member's name, address, telephone numbers, e-mail address(es),
- names and ages of the Member’s dependants

For protecting the Member’s vital interests and those of their dependants, we collect and store emergency contact details, enabling us to contact next of kin in the event of an emergency.

For managing membership categories which are age related, we collect and update the Members age and, for the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets), we also collect gender, occupation and disability information.

For managing the Member’s and their dependants’ membership of the Club and for the provision of services and events, the club collects bank account details of the member or other person making payment to the Club.

For managing instruction at the Club, we hold and share to members details of instructor’s name, address, email addresses, phone numbers and relevant qualifications and/or experience.

For the purposes of our legitimate interests in ensuring all club activities can be conducted safely, we hold Members qualifications relating to power boating, sailing and other relevant activities and, so that boats on a rally can maintain contact with each other, we hold and share with other rally participants Radio Call signs.

For the purposes of our legitimate interests in holding races for the benefit of Club members, for the purposes of our legitimate interests in promoting the Club, and for allocating moorings and compound spaces, we collect and store Members' boat name, sail number, race entries and race results.

## **2.2 Reporting and sharing data with third parties**

For the purposes of our legitimate interests in promoting the Club, we share race results with other clubs, class associations, and the RYA, and provide race results to local and national media.

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). 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.

### **2.2.1 Reporting information to the RYA**

(The RYA may use the following information 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 the legitimate interests of the RYA to maintain diversity data required by Sports Councils, we collect, store and share with the RYA our Members' age, gender and disability information.

For the legitimate interests of the RYA in its capacity as the national body for all forms of boating we share with the RYA our Members' name and email address, boat name and sail number, and race results.

### **2.2.2 Reporting information to Sports NI**

We collect, store and share with Sports NI (and their auditors ICONI and Knight, Kavanagh & Page) on a quarterly and annual basis, as part of the Focus Club support programme, our Members' name, age, gender, postcode, disability information, and email and membership numbers. We also share data on active participation (on the water and in committee roles), coaches and instructors, and others as required.

## **3 Consent**

We will seek the Member's consent on their membership application form and each membership renewal form for the following:

- Consent to putting on the Club's website and social media pages and using in press releases photos and videos of members and their boats.
- Consent for creating and managing the Club's online Membership Directory using the Member's name and email address.

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 this section and the above [Reporting and sharing data with third parties](#) section.

The Member may withdraw their consent at any time by contacting us as described in the [Contacting Us](#) Section of this policy.

## **4 Security**

We are committed to ensuring that your information is secure.

### **4.1 Controlling your personal information**

We will not transfer your personal data outside the EU without your consent.

To prevent misuse, unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. 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 from you online 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.

### **4.2 How long do we keep your information?**

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 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.

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

## **5 Phishing**

Phishing is the practice of tricking someone into giving confidential information. Examples include falsely claiming to be a legitimate company when sending an e-mail to a user, in an attempt to get the user to send private information that will be used for identity theft and fraud.

We'll never ask you to send any personal details via email. If we require such details, for security reasons we'll ask you to contact us in person or by phone. Should you receive an email claiming to be from donaghadeesc.co.uk requesting this kind of information, please don't respond, but do let us know about it.

## **6 How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.

## **7 Links to other websites**

The Club's website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **8 Your rights**

### ***8.1 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.

### ***8.2 Complaints***

You have the right to take any complaints about how we process your personal data to the Information Commissioner at the website <https://ico.org.uk/concerns/>, by telephone 0303 123 1113, or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## **9 Contacting Us**

For written correspondence, our address is Donaghadee Sailing Club, 20 Shore Street, Donaghadee, Co. Down BT21 0DG. For general email correspondence and enquiries, our email address is [office@donaghadeesc.co.uk](mailto:office@donaghadeesc.co.uk).

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the address above. We will promptly correct any information found to be incorrect.

For more details regarding our data processing practices, please address any questions, comments and requests to our Honorary Secretary by emailing [honsecretary@donaghadeesc.co.uk](mailto:honsecretary@donaghadeesc.co.uk) or by writing to the address given above.