

# Priory Sailing Club

## CLUB DATA PRIVACY POLICY

1. About this Policy:-
  - 1.1 This policy explains when and why we collect personal information, 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 Processing Policy and as described when we collect data from you.
  - 1.3 We reserve the right to amend this Data Processing Policy from time to time without prior notice.  
You are advised to check our website [www.priorysc.org.uk](http://www.priorysc.org.uk) 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 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](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 Priory Sailing Club. We can be contacted via the [Commodore@priorysc.org.uk](mailto:Commodore@priorysc.org.uk)
3. What information we collect and why:-

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. .	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
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 and visitors	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.

Type of information	Purposes	Legal basis of processing
Members' age and gender.	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by the various Sports Councils incl. Sport England
Visitors' names, addresses and home clubs.	Managing visitors to the Club.	For the purposes of our legitimate interest in ensuring the Club rules on the number of times a visitor uses the Club are not breached.
Members, Competitors and Visitors names, boat names and sail numbers.	Managing race and event entries and race results.	For the purposes of our legitimate interests in holding races and other events for the benefit of members of the Club.
Members' and Visitors' names, boat names and sail numbers.	Sharing race results with other clubs, organisations, and the RYA, and providing race results to local and national media.	For the purposes of our legitimate interests in operating and promoting the Club.
Members' and Visitors' names, boat names and sail numbers.	Allocating moorings and compound spaces.	For the purposes of our legitimate interests in operating the Club.
Members' contact and boat details.	Publication of annual 'Members and Boats List'.	Consent. We will seek the member's consent for inclusion in the Members and Boats List. Members can withdraw their consent at any time by contacting us by email or letter. Note that if consent is withdrawn it will only become effective from the next re-printing of the List.
Photos and videos of members and their boats.	Putting on the Club's website and social media pages and using in press releases.	Pictures where names are used or under the age of 18 then Member's / parental consent, either specific or on their membership application form. Members may withdraw their consent at any time by contacting us by e-mail or letter.

Type of information	Purposes	Legal basis of processing
Radio call signs and mobile phone numbers.	Collected for events and shared between those organising and participating in events.	For the purposes of our legitimate interests in ensuring that boats in events can maintain contact with each other.
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.
Members name and e-mail address.	Keeping members informed as to Club activities and events.	For the purposes of our legitimate interests in operating the Club and for the proper performance of the Club's contract with the member.
Members' contact and boat details.	Passing on contact information for the owners of a found or abandoned boat showing 'Priory Sailing Club' Sticker initials, if requested by the Police / Coastguard / other emergency services.	For the performance of a task carried out in the public interest. For our legitimate interests in assisting our members. For the protection of the vital interests of our members and their crews.
Freelance or Employee details as required for their freelance contract / employment with the Club.	Proper employment of staff by the Club.	For our legitimate interests in offer freelance work or employing appropriate staff to provide the necessary service to our members and visitors.
Contractors' details in respect of contractors who have been or may be contracted to provide services to the Club.	Engagement of such contractors as may be required to maintain and enhance the facilities and services provided by the Club.	For our legitimate interests in maintaining and enhancing the facilities and services provided by the Club.  For the proper performance of the contract with our Members.

Type of information	Purposes	Legal basis of processing
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering RYA and other instruction and training courses and provide details of instructors to members.
Names, addresses, email addresses and telephone numbers of training course students and prospective students.	Managing instruction at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those desiring RYA and other instruction and training courses and provide details of courses to members and others.

4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the European Economic Area (EEA) without your consent.
- 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. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- 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 'legitimate interest' 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.

5.2a Another example of 'legitimate interest' would be working with our NGB the RYA or one of their partners to undertake membership surveys. 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.

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 is necessary to comply with our legal obligations, and for our legitimate interests in managing the Club (for example, rejoining members are not normally charged a new entry fee and thus it is necessary to ascertain whether someone applying for membership has been a member in the past). 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.

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 We would hope that in the first instance that if you have any complaint about how we deal with your personal information that you would approach us in the first instance to see if the complaint could be resolved.

However, 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 SAF

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

Helpline 0303 123 1113.

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Controller, who is the Commodore of the Club - contact details are [commodore@priorysc.org.uk](mailto:commodore@priorysc.org.uk)