

## HALIFAX SAILING CLUB - DATA PRIVACY POLICY

### 1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members and instructors, 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.halifaxsailingclub.org.uk](http://www.halifaxsailingclub.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 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](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 Halifax Sailing Club. We can be contacted at [info@halifaxsailingclub.org.uk](mailto:info@halifaxsailingclub.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 and 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 an emergency.	Protecting the Member's interests and those of their Dependants
Age related & gender information.	Managing Memberships which are age related.  Provision of adequate facilities for members.  Reporting information to the RYA.	Performing the Club's contract with the member.  For the purpose of our legitimate interests in making sure that we can provide sufficient and suitable facilities for each gender and all ages.  For the purposes of the legitimate interests of the RYA to maintain diversity data required by the Sports Council.

Type of Information	Purposes	Legal Basis of Processing
The Member's name, boat name and sail number	<p>Managing race entries and race results.</p> <p>Allocating compound spaces.</p>	<p>For the purpose of legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purpose of our legitimate interests in operating the Club.</p>
The Member's name and email address.	Creating and managing the club's online Membership Directory.	Consent. We will seek the Member's consent on their application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by email or letter to tell us that they no longer wish their details to appear in the Membership Directory.
Photos and videos of Member's and their boats.	Putting on the Club's website and using in press releases.	Consent. We will seek the Member's consent on their application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by email or letter.
Bank account details of the member or other 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.
The Members' name, address and email address, whilst a current member and for three years after ceasing to be a member of the club.	Provision of adequate facilities for members.	For the purpose of our legitimate interests in operating the Club.
Name and photo of each committee member.	Information published on the club website.	For the purpose of our legitimate interests in operating the Club.

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

- 4.1 We will not transfer your personal data outside the EU 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.
- 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 we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.

#### **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.

## 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 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

For more details, please address any questions, comments and requests regarding our data processing practices to [info@halifaxsailingclub.org.uk](mailto:info@halifaxsailingclub.org.uk)