

BOWMOOR SAILING CLUB AND SUPPORTERS CLUB DATA PRIVACY POLICY

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members, trainees 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 Club Documents www.bowmoor.co.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). 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 Bowmoor Sailing Club and Bowmoor Sailing Club Supporters. We can be contacted at Coln Park Lake, Fairford Road, Lechlade, GL7 3DT, memb@bowmoor.co.uk, 01793 765074

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. Managing 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 emergency	Protecting the Member's and trainees 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.	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.

	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
The Member's 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 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.
	Allocating moorings and compound spaces.	For the purposes of our legitimate interests in operating the Club
Photos and videos of members and their boats	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. On Open Meeting Race Entry Forms and Training Forms.
The Member's name and e-mail address	Creating and managing the Club's Newsletter Data Base	Consent. We will seek the Member's consent on the sign up form for the Newsletter. Each Newsletter gives the person the opportunity to unsubscribe.

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.
Member's name and email address	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
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 instruction and provide details of instructors to members.

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

- 4.1 We will not transfer your personal data outside the EU without your consent. This is currently done for the Newsletter Data Base.
- 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 manage sending newsletters, Memberships and Duties.). 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. 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

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager, memb@bowmoor.co.uk.

Appendix 1 Guidance on storage of Personal Data

Only the minimum amount of information should be collected. If you are not going to use it do not collect it.

Data on Paper

Data on paper must be kept secure which generally means storing it in a locked cupboard.

It should be kept for the minimum amount of time and when no longer required should be securely destroyed ie shredded or burnt. If data is collected / printed for an event it should be destroyed as soon as the event is finished unless the data has an additional use.

Gift aid declaration records must be kept for 6 years from the end of the accounting period they relate to.

If data is intended to be passed to a third party for their use ie a sponsor then the provider of the data must explicitly consent to this. They need to tick a specific box.

Data on a Computer

The computer should be password protected, the software should have all updates applied. The computer should have up to date antivirus software.

Any files should be password protected when they are stored and if they are sent to another official.

Data should be kept for a minimum of time ie membership information on the membership data base kept for not longer than 2 years after they cease to be members and back up copies kept for no longer than 5 years.

Newsletter data base is controlled by the member they have to opt into it and can unsubscribe at any time.

Race results which contains just the name of the Helm and Crew plus boat details can be kept indefinitely.