Leigh-on-Sea Sailing Club (LSC) Data Privacy Policy

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members, 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.leighsailingclub.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 (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 Leigh-on-Sea Sailing Club Ltd. We can be contacted at The Old Town, Leigh-on-Sea, Essex, SS9 2EP, www.leighsailingclub.org, 01702 476788.

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. Keeping in touch with the Member (including by newsletter). | Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club. |
| | Managing the duty roster. | 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 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. |
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| | 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. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media. Allocating moorings and compound spaces. | For the purposes of our legitimate interests in holding races for the benefit of members of the Club. For the purposes of our legitimate interests in promoting the Club. 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 and the Member may withdraw their consent at any time by contacting us by e-mail or letter. |
| Closed Circuit Television (CCTV) images. | Protecting the Member's and Club's property. | For the purposes of our legitimate interests in operating the Club. |
| Radio call signs | Collected for a rally and shared between those participating in the rally. | For the purposes of our legitimate interests in ensuring that boats on a rally can maintain contact with each other |
| The Member's name and e-mail address | Creating and managing the Club's Membership Directory. | Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory. |

| Member's name and e-mail address (cont.) | 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 |
|--|---|---|
| On occasion LSC will obtain and store medical data. | To ensure the safety of participants in sailing or other activities. The appointed organisers of these activities are responsible for the correct treatment of this data. | To protect the interests of the participant. |
| Vetting for Positions of Trust through the Disclosure and Barring Service. | To help assess applicants' suitability for positions of trust, Leigh-on-Sea Sailing Club. Disclosure information will be reviewed by the welfare officer and the document references recorded. The DBS document itself will not be retained by the club. Handling In accordance with Section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information have been revealed and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it. Usage Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given. | For the purposes of our legitimate interests in operating the Club and protecting our members. |

| DBS checks should be | |
|------------------------------|--|
| conducted for regular | |
| cadet leaders. The club | |
| Welfare Officer will | |
| determine if occasional | |
| helpers or the parents of | |
| participating cadets require | |
| DBS checks. | |

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 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). 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. Responsibility

Responsibility for data protection lies with the officer responsible for the activity.

As guidance responsibilities would be as follows:

Employment records: Hon. Secretary Membership: Hon. Assistant Secretary Sailing Events: Hon. Sailing Secretary

Cadet Activities: Cadet Leader

Data on Website & Social Media: Publicity Officer Payment and Financial Data: Hon. Treasurer

Collecting bar staff tax information: Bar Chairperson

Annual File Review: Hon. Secretary

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 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 our Hon. Secretary by mail to the club address or email to leighsailingclub@gmail.com