

SULLY 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 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.sully-sailing.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). 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 Sully Sailing Club. We can be contacted at admin@sully-sailing.org.uk .

3. Where is information held at the club and how is it shared

3.1 By club officers in their role managing the running of the club

3.2 On DutyMan, the event and club duty allocation computer programme used by the club, members names are shown in the duty roster but phone numbers and an email link are only shown on the password protected view. Members may opt out of the latter - see below – 4.4A.

3.3 On the club website: sully-sailing.org.uk (only members’ names and race results are shown by default; photos, where individuals can be identified, are only displayed where a member has opted in – see below – 4.4B and C)

3.4 On club social media

3.4.1 Club WhatsApp Groups: names and photos may be posted but are only available to club members who request to be added.

3.4.2 Photo sharing via a private link (normally from a WhatsApp group, as above)

3.4.3 Club X feed - Sully News: club members may be mentioned by name, but photos, where individuals can be identified, are only displayed where a member has opted in– see below – 4.4B and C.

3.4.4 Club Newsletters, as well as being emailed to members, are held on the club Google Drive with a link from the club website. Photos in the newsletters, where individuals can be identified, are only displayed where a member has opted in– see below – 4.4B and C.

4. What information we collect and why

Type of information	Purposes	Legal basis of processing
4.1 The following cannot be opted out of and are a condition of membership		
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Managing the duty roster via DutyMan.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
The names and ages of the Member's dependants	Managing the Members' 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
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 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
4.2 We will not seek permission for the following, although if a member feels strongly they can contact the committee (admin@sully-sailing.org.uk) to ask for photos showing themselves and their family not to be displayed and change their privacy settings via the privacy tab on DutyMan.		
Names, photos and information shared on the club private Whatsapp groups	General communication by club members	For the purposes of our legitimate interests in operating the Club.
Display of member's name, telephone number and e-mail address on password protected pages of DutyMan	In order to facilitate the swapping of OOD and sailing duties. Duties can be swapped using DutyMan without displaying the name, but the name makes swapping much easier.	For the purposes of our legitimate interests in operating the Club,

Type of information	Purposes	Legal basis of processing
4.3 The following is optional information which need not be shared with the club and on the membership form		
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.
Gender (cont)	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
Members's relevant qualifications and/or experience (e.g. as instructor)	Managing power boat duties and instruction at the club.	For the purposes of our legitimate interests in ensuring that we can allocate duties and contact those offering instruction
4.4 We will ask members if they wish to opt into the following. 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 editing their information on DutyMan, completing a form at the club, or by contacting us by e-mail or letter. No response on the application form or initial request for information will be assumed to be opting out of A and B. No response on the membership renewal form will be assumed to indicate no change.		
A Photos and videos of members.	Displaying on the Club's website, X feed, Newsletters, and using in press releases.	For the purposes of our legitimate interests in operating the Club to publicise and share what we do externally.
B Photos and videos of member's children.	Displaying on the Club's website, X feed, Newsletters, and using in press releases.	For the purposes of our legitimate interests in operating the Club to publicise and share what we do externally.

5. How we protect your personal data

5.1 We will not transfer your personal data outside the area covered by the GDPR without your consent.

5.2 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.

5.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

5.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

6. Who else has access to the information you provide us?

6.1 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.

6.2 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 host the Club's Website, manage Patrol Boat duties, 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.

7. How long do we keep your information?

7.1 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.

7.2 We may archive selected data concerning your participation within the Club e.g. a member's name, boat sailed, sailing activities, duties contributed to the Club or honours awarded by the Club. Race results are held indefinitely and will be displayed on the club website.

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

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: