

## **Grafham Water Sailability 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; 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 Protection Policy from time to time without prior notice. You are advised to check our website <http://www.grafhamwatersailability.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 (<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 Grafham Water Sailability and can be contacted via Grafham Water Centre, Perry, Huntingdon, Cambridgeshire PE28 0GW or via email [members@grafhamwatersailability.org.uk](mailto:members@grafhamwatersailability.org.uk)

### **3. What information we collect and why**

<b>Type of Information</b>	<b>Purposes</b>	<b>Legal Basis of Processing</b>
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Keeping member informed of club activities	Performing the Club's contract with the member. For the purposes of our legitimate interests in operating the Club.
The name(s) of the Member's carers	Managing the member's membership of the club	Performing the club's contract with the member
Emergency contact details	Contacting next of kin in event of emergency	Protecting the member's vital interests and those of their dependents
Date of birth and other	Ensuring we are able	Performing the Club's

Type of Information	Purposes	Legal Basis of Processing
age related information	to provide age appropriate sailing for all our members	contract with the member.
Gender	<p>To ensure we provide adequate facilities for our members.</p> <p>Reporting information to the RYA</p>	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities for each gender and to ensure we are an equal opportunities club.
Visitors' names, their boat names and sail numbers, their postal addresses, e-mail addresses and phone numbers	<p>To have control over and knowledge of visitors to the site for safeguarding and security purposes.</p> <p>To organise and run open meetings and other events</p> <p>To share race results with other clubs, class associations, and the RYA, and providing race results to local and national media.</p>	<p>For the purpose of our legitimate interests in complying with GWC regulations and ensuring the safeguarding of our members.</p> <p>For the purposes of our legitimate interests in running the club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p>
Photos and videos of members, visitors and their boats	Putting on the Club's website and social media pages and using in press releases and to promote the club generally.	<p>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.</p> <p>We will seek the consent of visitors via regatta entry forms and/or the signing in sheets</p>
Bank account details of the member or other	Managing the members' and their	Performing the club's contract with the

<b>Type of Information</b>	<b>Purposes</b>	<b>Legal Basis of Processing</b>
person making payment to the Club	dependents' membership of the Club, the provision of services and events and the raising of funds	member and visitors, and being able to provide the facilities for the club to operate
Members' names and email addresses	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.
Names, postal and email addresses, phone numbers and relevant qualifications and/or experience of our members.	Managing instruction and safety cover at the club	For the purposes of our legitimate interests in ensuring that we can contact suitably qualified volunteers to enable our disabled sailors to enjoy their sport in a safe and suitably controlled environment.
Members' and visitors' health information	To ensure we can respond appropriately to any emergency and provide appropriate facilities and support for all our members and visitors no matter what their disability	<p>Explicit consent of the data subject or the representative of a member lacking capacity.</p> <p>To ensure the vital interests of an individual are met in the event of an emergency.</p> <p>The processing is carried out in the course of the legitimate activities of GWS, with respect to its own members and former members.</p>

#### **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 sending 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 with?**

- 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 in this event, we will 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 retain your personal data 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, 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:

- 7.1.1. To access your personal data
- 7.1.2. To be provided with information about how your personal data is processed
- 7.1.3. To have your personal data corrected
- 7.1.4. To have your personal data erased in certain circumstances
- 7.1.5. To object to or restrict how your personal data is processed
- 7.1.6. 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 our John Wright, our lead Trustee on data protection issues.