



# Orkney Sailing Club

THE GIRNEL, HARBOUR STREET, KIRKWALL, ORKNEY. KW15 1LE

## DATA PRIVACY & PROTECTION POLICY

### 1. About this Policy

- 1.1 Post BREXIT the Orkney Sailing Club (OSC) complies with the terms & conditions of (i) DPA (Data Protection Act) 2018 and (ii) UK GDPR (General Data Protection Regulation), as only domestic personal data is processed.
- 1.2 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.
- 1.3 We may collect, use, and store your personal data, as described in this Policy, when we collect data from you.
- 1.4 We reserve the right to amend this Policy from time to time without prior notice. You are advised to check our website [www.orkneysailingclub.org.uk](http://www.orkneysailingclub.org.uk) or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.5 We will always comply with the appropriate regulations as documented in §1.1 when dealing with your personal data. Further details on the regulations can be found at the website for the Information Commissioner ([ico.org.uk](http://ico.org.uk)). For the purposes of the UK GDPR, we will be the “controller” of all personal data we hold about you.

### 2. Who we are

- 2.1 We are Orkney Sailing Club. We can be contacted at The Girnel, Harbour Street, Kirkwall, Orkney, KW15 1LE. Email: - [orkneysc.members@gmail.com](mailto:orkneysc.members@gmail.com)

### 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, 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 dependant's 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
	Reporting information to the RYA	For the purposes of the legitimate interests of the RYA to maintain diversity data as required by Sports Councils
The Member's name, boat name, sail number and boat specification; length, beam, draught etc	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 & 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
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
Bank account details of the member or other person making payment to the Club or receiving payment from 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 Member's name and e-mail address, whilst a current member and for up to one years after ceasing to be a member of the Club	Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club. See paragraph 5.3 below.	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
Name, e-mail address and telephone number of each Club Officer	Information published on the Club's website, in the Club's publications and made available to the RYA, in each case as a point of contact at the Club. As required by law.	For the purposes of our legitimate interests in operating and promoting the Club
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website and used in connection with the operation of the Club	For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	Entering and managing arrangements with suppliers	Entering and performing contracts with suppliers

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

- 4.1 We will not transfer your personal data outside the UK without your consent.
- 4.2 We have implemented generally accepted standards of technology and operational security 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 is not regarded as 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.
- 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). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we will have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.
- 5.3 We may also pass your personal data to the Royal Yachting Association (RYA) for the purposes of carrying out surveys when it is in the legitimate interest of the Club and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party 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 it is in the Club's 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 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 UK 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:

[ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint)

Phone: 0303 123 1113

For more details, please address any questions, comments and requests regarding our data processing practices to our Membership Secretary at [orkneysc.members@gmail.com](mailto:orkneysc.members@gmail.com)