

## Broxbourne Sailing Club, Privacy Policy

### 1. About this Policy

- a. This policy explains when and why we collect personal information about our members, our instructors and our visitors, how we use it and how we keep it secure and your rights in relation to it.
- b. We may collect, use and store your personal data, as described in this Data Privacy Policy.
- c. We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website, or contact the Club at <https://broxbournesailingclub.co.uk/contact.php>, or the Club's noticeboard regularly for any amendments (amendments will not be made retrospectively).
- d. We will 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](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?

- a. We are Broxbourne Sailing Club. Contact us by writing to: Meadgate Road, Nazeing, Essex EN9 2PB, email: <https://broxbournesailingclub.co.uk/contact.php>, or: phone 01922 467412.

### 3. The types of Information we collect and why.

Type of Information	Purpose(s)	Legal basis for Processing
Members names, postal address, telephone number(s), email address/addresses, date of birth, sail number(s), names of family members included in the membership, including their names and dates of birth, membership number.	Membership administration. Boat/berth management. Controlling access to the club grounds. Event management and related communications.	Performance of Contract.
Name, telephone number(s), email address/addresses, membership number.	Duty roster administration.	For the purposes of our legitimate interests in operating and maintaining the Club.
Name, address, email address/addresses, types of boat, sail number(s).	To provide: Club newsletters. Class related communications. Notification of Club activities.	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, to the membership secretary, email address via Club's website. The address for the membership secretary is printed on the membership application form.
Names, type(s) of boat, sail numbers.	To manage races, to establish and publish the results of races and for use in prize giving ceremonies. To establish and publish the current positions in a series of races. The results, interim positions and race reports will be published on the Club's web site but may also be provided to third parties such as other clubs, class associations, Yachts & Yachting, the RYA and local and national media. Race results may also be used to develop the 'Portsmouth Yardstick' system and for local handicap purposes.	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, to the membership secretary, email address via Club's website. The address for the membership secretary is printed on the membership application form.

Names, type(s) of boat, sail numbers, photographs, videos, audio.	General publicity and promotion of the Club on social media, the club's web site, 3rd party publications, newsletters and 3rd party web sites (such as the RYA).	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, to the membership secretary, email address via Club's website. The address for the membership secretary is printed on the membership application form.
Names, email addresses and contact numbers of committee members, officers of the club and members of sub committees. Home address of the Membership Secretary.	Printed in the sailing programme. Provided to members from time to time as required for the operation of the Club and to support any legal obligations. Names and official BSC email addresses may be published on the Club's website. Provided to external parties, such as the RYA, as necessary for the operation of the club.	For the purposes of our legitimate interests in operating the Club. To ensure that members can contact the management team as needed.
Name(s), postal address, nature and details of the accident.	Accident records.	Legal obligation.
Names, postal addresses, telephone number(s), email address/addresses, dates of birth, training courses attended, or to be attended.	Supplying information about training courses and development options. Supplying information about events at the Club.	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, to the membership secretary, email address via Club's website. The address for the membership secretary is printed on the membership application form.
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, ensuring that we can contact those offering instruction and provide details of instructors to members.
Names, postal addresses, telephone number(s), email address/addresses, company name.	We will hold details of third party suppliers, partners (such as other sailing club representatives) and other bodies (such as the RYA and the Lee Valley Parks). This data will be used to help us to manage our contracts and relationships with these third parties.	Performance of Contract.

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

- a. 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.
- b. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- c. Please note however that whenever you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

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

- a. 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.b. below.
- b. 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/emails). However, we disclose only the personal data that is necessary for the third party to deliver the service.
- c. No personal information is routinely available outside of the UK.

**6. Managing Security.**

- a. To ensure the Club's premises are a safe environment for all members and visitors we use CCTV. We may share this information with the Police or other certified investigators.

**7. How long do we keep your information?**

- a. 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 may retain your personal data in an archived form in order to be able to comply with future legal obligations, such as the defence of legal claims.

<b>Data Type</b>	<b>Retention Period</b>
Membership data.	12 months after membership has lapsed, unless there is a legal reason for keeping the data; in which case the data will be kept until such time as the legal matter is fully resolved.
Duty data. Email list.	12 months after membership has lapsed, unless there is a legal reason for keeping the data; in which case the data will be kept until such time as the legal matter is fully resolved.
Training records.	12 months after membership has lapsed, unless there is a legal reason for keeping the data; in which case the data will be kept until such time as the legal matter is fully resolved.
Accident Records.	3 years after membership has lapsed, unless there is a legal reason for keeping the data; in which case the data will be kept until such time as the legal matter is fully resolved.
Race results.	5 years following the end of the relevant sailing programme.
CCTV and webcam video and pictures.	30 days after the video or webcam pictures have been taken. We retain CCTV footage for 30 days before it is overwritten. The information may be retained for a longer period if imagery is required for evidential purposes.

**8. Your rights**

- a. You have rights under the General Data Protection Regulation (GDPR), as follows:
  - I. to access your personal data.
  - II. to be provided with information about how your personal data is processed.
  - III. to have your personal data corrected.
  - IV. to have your personal data erased in certain circumstances.
  - V. to object to or restrict how your personal data is processed.
  - VI. to have your personal data transferred to yourself or to another business in certain circumstances.
- b. 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 the Club's Secretary: email address via the Club's website.