



LARGS SAILING CLUB LIMITED
DATA PRIVACY POLICY - MAY 2018



New data protection regulations (the General Data Protection Regulations, which replaces the Data Protection Act) came into effect on 25th May 2018. Largs SC's policy is set out below, based on guidance from the RYA's Legal Department, and adapted to our Club's requirements and circumstances.

Members are reminded that the Club is a Limited Company, governed by our Memos and Articles, and by our Club Management Rules. Both these documents are available on the Club's web site's Publications page - see <http://www.largssc.co.uk/club/publications>.

1. About this Policy

1.1

This policy explains when and why we collect personal information about our members, 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 Privacy Policy from time to time without prior notice. You are advised to check the Club Publications page of our website (<http://www.largssc.co.uk/club/publications>) or our Club notice board 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 Largs Sailing Club. We can be contacted at Largs Sailing Club, Largs Yacht Haven, Irvine Road, Largs, North Ayrshire KA30 8EZ, telephone 01475 670000, e-mail secretary@largssc.co.uk.

3. What information we collect, and why

| Type of information | Purposes | Legal basis of processing |
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| Member's name, address, telephone numbers, and 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. <i>(Note - the Club's policy is that all Members will be contacted by e-mail.</i> |

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| | | <i>Members not giving at least one valid e-mail address per membership are required to pay the supplement for communications by post.)</i> |
| The names and ages of the Member and 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. Reporting anonymised information to the RYA. | 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. For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils. |
| Member's and dependants name(s), address, and e-mail address(es). | To send to Members and dependants by e-mail or post, newsletters, general mailings, reports and information on past, present and future Club and other activities considered to be of likely interest to Members. | For the purposes of informing Members, and their dependants, of the Club's activities, and our legitimate interests in operating and promoting the Club. Consent - we will seek Member's consent for sending such general material. <i>(Note - Members can NOT opt out of receiving "business" information on the Club e.g. notice of General Meetings, subscription administration and renewals etc.)</i> |
| The Member's name, boat type, boat name and sail number. For sailing events, we may include the name(s) of Helm, Crew, and the nominated Club. | Allocating dinghy park spaces, and collection of fees. Managing race entries and race results. Sharing race results with | For the purposes of our legitimate interests in operating the Club. For the purposes of our legitimate interests in holding races for the benefit of Members of the Club. For the purposes of our |

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| | other clubs, class associations, and the RYA, and providing race results to local and national media. | legitimate interests in promoting the Club. Consent - we will seek consent from participants in racing to publish race results on notice boards, the Club's website, other media, and in newsletters. |
| Other information, including RYA qualifications, volunteer status, occupation, Member's interest(s), and other relevant internal notes about your membership which are created by the Club. | The efficient administration of a Member's membership. Knowledge of Members' experience, skills, and availability for volunteering at Club events, and tailoring Club activities to the interests of Members. | Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club. |
| Photos and videos of Members, Temporary Members, and Visitors during Club events or functions, and/or their boats. | Putting on the Club's website and social media pages, in newsletters, and using in press releases. | Consent - we will seek the Member, Temporary Member or Visitor's consent on their membership application form, at each membership renewal, and in entry forms for Open Events. The Member, Temporary Member or Visitor may withdraw their consent at any time by contacting us by e-mail or letter. |
| CCTV, and webcam(s) - recording of images | Security of Club and members' property, crime prevention, information on current weather conditions and slipway activity. | Security of Club and members' property, crime prevention. <i>(Note - the Club presently has no CCTV, and the webcam which views our slipway does not store recorded images. However, this may change in the future.)</i> |
| For cruises in company, the Member's name and Crew name(s), boat name, and mobile telephone numbers. | Collected for a cruise in company or similar, and sharing between those participating in the cruise, or planning to join the cruise later. To record for our records the boats on cruises. | For the purpose of our legitimate interests in operating the Club and promoting the Club. For the purposes of our legitimate interests in ensuring that boats on a cruise in company or similar can maintain contact with each other. Protecting the Member and crew's vital interests and those of their dependants. |

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| | | Before each cruise the cruise co-ordinator will ask for their Consent in posting that cruise's information on the Club notice board. |
| The Member's name, boat name, boat type, and telephone numbers. | <p>Creating and managing the Club's yearbook, or online Membership Directory.</p> <p><i>(Note - the Club has not issued a yearbook since 2012, and has no immediate plans to produce one, or to create an online Membership Directory, but this would allow us to do so in the future.)</i></p> | <p>Consent - we will seek the Member's consent on their membership application form and at each membership renewal cycle. 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 yearbook or Directory.</p> <p>However, in the case of a hard-copy version of a yearbook or other listing of Members, the personal information shown will remain until the next revision of the document, or its withdrawal.</p> |
| We may hold bank account details of the Member or other person making payment to the Club, or receiving reimbursement from the Club. | <p>Managing the Member's and their dependants' membership of the Club, the provision of services and events.</p> | <p>Performing the Club's membership contract, 50-50 Club contract with the Member, or the Club's policy on reimbursing Members' approved expenses. Any such details will be destroyed within a reasonable period of time upon ceasing to be legitimately required.</p> <p><i>(NB - the Club does NOT presently hold such details for Members, as online membership and berthage payments are through WebCollect.)</i></p> |
| The Member and dependants' names and other details whilst a current Member(s), and for up to 6 years after ceasing to be a member of the Club. | <p>Contacting current and previous members.</p> <p>Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club. See paragraph 5.3 below.</p> | <p>For the purposes of our legitimate interests in operating the Club.</p> <p>For the legitimate interests of the RYA in its capacity as the national body for all forms of boating.</p> |

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| Member's and Past Member's Loan details | Managing the Member's and Past Member's Loan, and the Loan Repayment Scheme. | Performing the Club's contract with Member(s), and Past Member(s). |
| Name, e-mail and telephone contact details of each Club Officer, Club Administrator, and Club Steward. | Names may be published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the RYA, in each case as a point of contact at the Club. Contact will normally be through the Club office. | For the purposes of our legitimate interests in operating and promoting the Club. |
| Visitors Book - Visitor(s) name(s) and full postal address(es), introducing Member's name and signature. | To comply with our Local Authority's and the Police's alcohol licensing requirements, and satisfy the Club's Management Rules. | For the purposes of our licensing requirements, and legitimate interests in operating the Club. For the purposes of our legitimate interests in promoting the club." |
| Member's name, address, telephone numbers, e-mail address, and RYA qualifications. | Sharing this information on our Members who volunteer with, or receive training from, our sister training organisation, the Largs Sail Training Association. | For the purposes of our legitimate interests in operating the Club, and the Largs Sail Training Association. |
| Non-member Volunteers' names, addresses, telephone numbers, e-mail address(es), and RYA or relevant race management qualifications and experience. | The efficient administration and use of non-member volunteers. | For the purposes of our legitimate interests in operating the Club. For the purposes of our legitimate interests in promoting the Club. |

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

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 (e.g. Discount Card partners), 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, and to facilitate your receipt of discounts from our partners). We do this for the purpose of our legitimate interests in operating the Club, for performing our contract with you, and to facilitate your prompt receipt of discounts from our partners. However, we disclose only the minimum 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. It is possible that third parties may themselves engage others 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 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 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. Your rights

7.1

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.

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/>

Information Commissioner's Office, Wycliffe House, Water Lane,
Wilmslow, Cheshire SK9 5AF

Telephone 0303 123 1113

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer - The Membership Secretary, Largs Sailing Club, Largs Yacht Haven, Irvine Road, Largs, North Ayrshire KA30 8EZ; telephone 01475 670000; e-mail secretary@largssc.co.uk.

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