



## Eastbourne Sovereign 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: [sailing@eastbourne.co.uk](mailto:sailing@eastbourne.co.uk) 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 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?

We are Eastbourne Sovereign Sailing Club. We can be contacted at Royal Parade, Eastbourne, East Sussex, BN22 7AA; 01323-720715; 07340-686081.

### 3 What information we collect and why

Type of information	Purposes	Basis of processing
Member’s name, address, telephone numbers, email 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 dependents.	Managing the Member’s and their dependents’ 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 dependents.
Date of birth / age related information.	Managing membership categories which are age related.	Performing the Club’s contract with the Member.



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.
Member's name and email address	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 Club's (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.  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 email or letter.
Instructor's name, address, email address, 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.

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

- 4.1 We will not transfer your personal data outside the EEA 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 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 required to do so by law or as set out in the table above or paragraph 5.2 below.

## **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 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 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: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF - <https://ico.org.uk/concerns/> - 0303-1231113

For more details, please address any questions, comments and requests regarding our data processing practices to The General Secretary, ESSC, Royal Parade, Eastbourne, BN22 7AA

**10 March 2018**