



WSC Data Privacy Policy – Version 4.0

General

1. Warsash Sailing Club (WSC) is subject to the General Data Protection Regulation (GDPR) which replaces the Data Protection Act 1998 on 25th May 2018 and for which WSC was exempt registration.
2. This Data Privacy Policy explains when and why we collect personal information about our members, staff and our instructors, how we use it, how we keep it secure and members/staff rights in relation to it.
3. WSC may collect, use and store members/staff personal data, as described in this Data Privacy Policy and as otherwise described when we collect data from members (e.g. for pound spaces and racing registration).
4. WSC reserves the right to amend this Data Privacy Policy from time to time without prior notice. Members are advised to check the Club website [<http://www.warsashsc.org.uk>] for any amendments which will also be notified in the Lobster Log. However, amendments will not be made retrospectively.
5. WSC always complies with the GDPR when dealing with members'/staff personal data. Further details on the GDPR is published by the Information Commissioner (www.ico.gov.uk).

Responsibilities

6. The Executive Committee is responsible for publishing and implementing this policy to ensure that GDPR is satisfactory followed in WSC in accordance with Club Rule 51.
7. For the purpose of the GDPR:
 - a. The Hon Sec is the Club's Data Protection Officer;
 - b. The Administrator is the Data Controller;
 - c. The Chairman of the IT committee is the Data Processor;
 - d. Data subjects are past and present members of WSC and its staff.
8. The responsibility for adhering to GDPR on a day-to-day basis is everyone's responsibility, and is NOT solely the responsibility of Officers, Committee members or senior staff. Everyone must do their part to ensure that the GDPR is adhered to and not breached.
9. The Data Protection Officer shall highlight to the Executive Committee any issues or concerns regarding the implementation of GDPR within WSC. Data protection is a standing Agenda item for the Executive Committee.
10. The Data Controller shall be responsible for, and be able to demonstrate, compliance with the principles of the GDPR.
11. The Data Processor is to keep a record of all processing carried out within/for WSC including for subject access requests.

Holding of Essential Data

12. So that WSC can deliver its contract of membership with Members, WSC requires to hold the minimum essential personal data, both physically and in an electronic database(s) of: name, address, contact telephone(s), email, membership number and for those under 18 parent/guardian contact details and for those wishing to pay by direct debit then also their bank account details.
13. WSC similarly requires to hold minimum essential personal data, both physically and in an electronic database(s), to deliver the contracts of additional services (e.g. training, youth sailing,

launch, dinghy racing, Spring Series, race patrol boats, pound storage, moorings etc) requested by members and external registrees. In addition to members' and registrees' names, this information includes details of emergency contacts, next of kin, sailing and power boat qualifications, boats owned etc.

14. WSC requires to hold minimum essential personal data of employees (e.g. name, address, telephone, Next of Kin details and bank details) so as to meet WSC's legitimate interests as an employer including paying staff. The Club also holds other records of employees (e.g. contracts of employment, accident reports, hours worked, periods reported sick, holiday requests) so as to meet its statutory requirements as an employer.
15. WSC will separately hold on web-based and/or hard copy rosters, the minimum contact details (e.g. name, telephone number, email) of all members who volunteer for duty (e.g. Duty Officer, security, dinghy racing and bar).
16. WSC holds minimum contact details of visitors to manage evacuation in the event of an emergency and to meet licensing legislation.
17. WSC requires to hold personal details of those involved in incidents and accidents, including medical details on injuries, to comply with Health and Safety legislation (e.g. accident book entries).
18. WSC requires to email members with important organisational information, so as to be able to operate the Club effectively. WSC also requires to email those participating in cruiser, dinghy and Spring Series racing in its legitimate interests in managing and promoting sail racing. However, members and racing participants are able to opt out (i.e. using Mail Chimp functionality) of email communications either for "non-essential" emails (e.g. concerning social functions) or all emails. Club organisers, officials and co-ordinators when emailing other members, without using MailChimp, are to use the blind copy (BCC) function to prevent those without a need to know from seeing the addresses others on the distribution.
19. WSC will hold members' membership personal data for as long as they are a member of the Club and for as long afterwards as is necessary to comply with its legal obligations. When members resign from WSC, their personal data held on the membership database will be marked as "past member" for a period of 5 years (or longer if otherwise required by the law) to enable leaving members to re-join within 5 years (i.e. Club Rule 21).
20. WSC will hold other personal data (i.e. minimum essential data for additional services such as dinghy registration and pounds etc) only for as long as necessary to effectively provide that service. These data records will be destroyed when they expire (e.g. annually or at the end of the subscription period) unless the law requires them to be held for longer.
21. WSC will securely destroy all financial data once it has been used and is no longer needed, except where its retention is required by the law.
22. Furthermore, WSC will review past members' personal data every year to establish whether WSC is still entitled to process it. If WSC decides that it is not entitled to do so, it will stop processing such personal data, except that it will retain such data in an archived form in order to be able to comply with legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.
23. Privacy Notices will be provided to members setting out the legal basis upon which data is processed e.g. necessary for the purpose of delivering membership or additional services, the purposes for which it is being collected, how it will use it and how long it will be retained. Any consent for the holding of data given by children under the age of 16 is to be countersigned by their parent/guardian.

Member Consent for Holding "Additional Data"

24. Personal data is a key tool for WSC managing its membership: GDPR means that WSC must handle personal data with the utmost care. WSC can only hold additional personal data (i.e. above that minimum required to manage the contract of membership, or employment or the

provision of additional services) with the explicit permission of each Club member and member of staff concerned. Images are examples of such additional data.

25. Therefore, members are to be asked to provide their consent for WSC to hold additional personal data. Such permission is to be given in the form of “opt in” statements within relevant registration /membership forms.
26. If members withdraw their consent for the holding of such additional data, then it is to be deleted. Such action may mean that said member is no longer able to take part in activities related to such data.
27. Permissions given or withdrawn by members (e.g. within “opt in” statements for optional publicity mailing lists etc) will be recorded using suitable software tools (e.g. using MailChimp or ESP functionality).

How WSC protects Personal Data

28. WSC will implement generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. WSC will notify members/staff promptly in the event of any breach of personal data which might expose members/staff to serious risk.
29. Members are to note that the transmission of personal information to WSC via the internet can never be 100% secure.
30. All data held by WSC will be routinely and securely backed up.
31. WSC will use a recognised online secure payment system for any payments made on line.
32. Hard copy personal data will be held securely (i.e. under lock and key) either by the data controller (e.g. membership forms), accounts person (e.g. financial data) or by the Club official co-ordinating that particular function (e.g. moorings, pound space, dinghy registration, Spring Series, youth sailing etc).
33. Soft copy personal membership data is primarily to be held on the ESP membership system which is automatically backed up within the UK and is designed to meet the requirements of GDPR. Subsets of personal data (e.g. name, telephone number and email address) are held within “Mail Chimp” (for member emails concerning Club operations and racing notices), “Dutyman” (for dinghy racing, security, bar and flag officer duties). These systems are provided with access control mechanisms to comply with GDPR. All other software products being considered for use in processing personal data are to be confirmed compliant with GDPR before adoption.
34. Staff, Officers, Club officials and co-ordinators using softcopy subsets of members’ personal data (e.g. spreadsheets) either on their personal, or on Club owned, digital devices (i.e. electronic devices that can receive, store, process or send digital information such as PCs, laptops, Macs, smart phones etc) to manage e.g. event bookings, youth sailing, bar volunteers, pound allocations, dinghy racing, Spring Series etc are to use generally accepted security technology to protect such data against Cyber-attacks or physical loss/theft. All digital devices holding/accessing personal data are to be screen-locked/password protected. All personal data held on portable digital devices (e.g. lap tops, back up drives etc) is to be encrypted.
35. All data breaches which threaten a data subject’s personal information are to be reported to the relevant authority within 72 hours of the breach being discovered, with proposals for mitigating such threats.

Publishing of Personal Data

36. The minimum contact details (i.e. name, agreed telephone and agreed email) of Flag Officers, Officers, Executive Committee, other officials (e.g. dinghy racing coordinator, moorings officer) are published externally (e.g. Who’s Who) such that they are able to carry out their duties.
37. The minimum contact details (i.e. name and telephone number) of duty personnel (i.e. security, dinghy race, bar operatives) are posted on duty roster lists within the Club buildings.

38. WSC does not currently publish on line, nor by hard copy, a directory of members. Contact information published on the Club website is password protected.
39. WSC does publish minimal details (e.g. boat and member name, class etc) of dinghy and Spring Series registrations on its website(s) and also uses the "Sailwave" software (or similar) to publish dinghy, cruiser and Spring Series racing results on its website(s). This publishing promotes racing and dinghy ownership in the Club and is in the legitimate interests of operating WSC.
40. Those responsible for publishing personal information (e.g. in a Lobster Log article, on a Club web site), other than the minimum contact details of officials, dinghy owners, racing results referred to in paras 36-39 above, must first obtain the written consent of such persons.
41. WSC will never sell members/staff personal data. WSC will not transfer personal data outside the European Economic Area (EEA) without member/staff consent. This means that any Cloud Back up used for any WSC data must physically reside in the EEA.
42. WSC will not share personal data with any third parties without members' prior consent (which members are free to withhold) except where required to do so by law or as set out in the table below or when said provision is a condition of WSC providing said service (e.g. boat and ownership details provided to the Harbour Master related to harbour dues and monitoring the safe mooring of said vessels).
43. WSC may pass personal data to third parties who are service providers, agents and subcontractors for the purposes of completing tasks and providing services to members on our behalf (e.g. to print newsletters and send emailings). However, WSC will disclose only the personal data that is necessary for the third party to deliver the service and where WSC has a contract in place that requires them to keep WSC provided information secure and not to use it for their own purposes.

Subject Access requests

44. Data subjects (e.g. members and staff) may request a listing of their information (including CCTV images) held and/or processing concerning themselves only, conducted by WSC (i.e. a Subject Access Request) by writing formally to the Hon Sec. The data controller is to action such requests within a period of 1 month, following a check to confirm (a) the identity of the data subject and (b) that such request concerns personal data. WSC may make a charge if such a request is manifestly unfounded or is excessive.

Members' Rights, Complaints and Queries

45. Members and Staff have the following rights under the GDPR:
 - a) to access their personal data;
 - b) to be provided with information about how their personal data is processed;
 - c) to have their personal data corrected;
 - d) to have their personal data erased in certain circumstances;
 - e) to object to or restrict how their personal data is processed;
 - f) to have their personal data transferred to themselves or to another business in certain circumstances.
46. Members and staff have the right to take any complaints about how WSC processes their 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
47. Members and staff are to address requests for more details, any questions, comments and requests regarding the WSC data processing policies to the WSC Data Protection Officer [honsec@warsashsc@org.uk].

Summary of personal data held by WSC

48. The following table contains a summary of the personal data that is held by WSC, together with its purpose and the legal basis for its processing, Sensitive personal information (e.g. medical conditions) will only be held in exceptional circumstances, necessary for the personal safety of the member concerned.

	Type of Personal Data Held	Purpose	Legal Basis for holding
A	Member's name, address, telephone numbers, e-mail address(es).	Managing a member's membership of the WSC.	Performing the Club's contract with a member. For the purposes of WSC's legitimate interests in operating the Club.
B	Bank account details of the member or other person making payment to the Club	Managing the member's and their dependants' membership of WSC, the provision of services and events.	Performing WSC's contract with a member or person seeking a service (e.g. a booking, membership).
C	The names and ages of the member's dependants	Managing the member's and their dependants' membership of the Club.	Performing the Club's contract with the member. For the purposes of our legitimate interests in operating WSC.
D	Emergency contact details	Contacting next of kin in the event of emergency.	Protecting the member's vital interests and those of their dependants.
E	Emergency medical information provided by parents/guardians	To safely manage youth sailing for children with medical issues	Protecting the member's vital interests
F	Minimum contact details (name, telephone, email) of those members volunteering for duties (e.g. Bar, Race, Officer, Security)	To enable duty rosters to operate, primarily using "dutyman" or spreadsheets. To enable duty members to arrange duty swaps, briefings, change-overs etc.	For the purposes of our legitimate interests in operating duty rosters so that the Club can sensibly function.
G	Member qualifications (e.g. PB2, Safety Boat, First Aid, Bar Trained)	To enable officials to only allocate functions. and duties to properly qualified members	For the purposes of our legitimate interests in ensuring that the Club operates safely and within the law.
H	Date of birth / age related information	Managing age related membership categories.	Performing the Club's contract with the member.
I	Gender	a. Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that WSC can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
		b. Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
J	Member's and other registrees name, boat name, boat details (e.g. length, weight, class, handicap, sail number). Including passing minimum contact details to other registrees (e.g. for protest resolution)	a. Managing race entries and race results.	For the purposes of WSC's legitimate interests in holding races for the benefit of members and registrees.
		b. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.	For the purposes of WSC's legitimate interests in promoting racing and the Club.
		c. Allocating moorings and dinghy pound spaces.	For the purposes of WSC's legitimate interests in operating the Club.
K	Publishing member's name, boat name, sail number and racing positions on the Club Web site(s).	a. Publicising dinghy, cruiser and Spring Series racing results	For the purposes of our legitimate interests in promoting sail racing in the Club. For the purposes of our legitimate interests in operating the Club

	Type of Personal Data Held	Purpose	Legal Basis for holding
		b. Publicising dinghy and yacht registrations in the club	For the purposes of our legitimate interests in promoting dinghy ownership and yacht racing in the Club.
L	Member and Race Participants names and email addresses held by, or sent using "MailChimp" (i.e. addressees' details hidden from each other)	Emailing members and race participants regarding the management of the Club and organisation of Sail Racing	For the purpose of our legitimate interests in operating the club and managing dinghy, cruiser and Spring Series racing. Note: members and participants may "opt out" of email contact via "MailChimp".
M	General email communications: organisers, officials and co-ordinators emailing members	Managing the operation of the club and co-ordinating the membership for various legitimate Club activities	For the purpose of our legitimate interests in operating the club. Note: hidden copy (BCC) functionality used to hide member email addresses from others.
N	Staff minimum contact details, bank details, employment record including accidents, overtime holiday bookings etc	Safely managing employees, calculating remuneration and paying wages.	For the purpose of our legitimate interest in acting as an employee.
O	Published minimum contact details (name, telephone, email) of officers and officials	Details of the minimum contact details of Duty Officers, Club Officers and Officials, are published on the widely distributed Who's Who and other external notices	For the purposes of our legitimate interests in operating the Club.
P	Noticeboard posted minimum contact details (name, telephone, email) of duty personnel	Minimum contact details of security, dinghy racing and bar volunteers etc are posted on noticeboards within the Club buildings.	For the purposes of our legitimate interests in operating the Club, members are able to ascertain who has the duty.
Q	Visitor's names and abodes	Visitor's Book. Details of visitor names and abode (i.e. home town, sailing club etc) and host member's name	For the purposes of our legitimate interests in operating the Club and meeting the requirements of the licensing authority regarding quests
R	Posted lists of prospective member names and abodes	Details of prospective members (names and abodes (i.e. town) are posted on noticeboards within the Club	For the purposes of our legitimate interests in operating the Club by enabling members to agree suitability of prospective new members
S	Accident Book: member/staff name, contact details and incident details	Personal details (name, address, occupation, telephone, injuries sustained, incident details)	For the purposes of our legitimate interests in operating the Club and meeting Health and Safety legislation
T	Radio call signs	Collected for a rally or racing and shared between those participating in the event.	For the purposes of our legitimate interests in ensuring that boats in an event can maintain contact with each other and the organisers.
U	External or WSC instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction at WSC.	For WSC's legitimate interests in ensuring that it can contact those offering instruction and provide details of instructors to members.

	Type of Personal Data Held	Purpose	Legal Basis for holding
V	Member's name and e-mail address	Passing to the RYA for conducting surveys of members of WSC (and members of other RYA affiliated clubs). The surveys are for the benefit of WSC, other clubs and/or the RYA.	For the purposes of our legitimate interests in operating WSC and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating
W	Non-member name, telephone number and email address obtained by WSC web site contact form	To permit the Club to respond to non-members using WSC web site to contact the Club with a query e.g. asking about membership etc. The data being destroyed after 1 year, if no longer needed.	For the legitimate business of WSC in being able to respond to the contact request. However, we will seek the <u>Consent</u> of the person enquiring to hold their name, telephone number and email address.
X	Photos and videos of members and their boats	Publishing on the WSC website, social media pages and using in press releases.	<u>Consent</u> . We will seek a member's consent on their membership application form, renewal form and/or registration form. The member may withdraw their consent at any time by contacting us by e-mail or letter.
Y	The Member's name and e-mail address, <u>should WSC decide to implement an on-line directory of members.</u>	Creating and managing the Club's online Membership Directory.	<u>Consent</u> . We will seek the Member's consent on their membership application form and each membership renewal form. 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 Directory.
Z	Additional Personal data that is not essential for the delivery of services to members.	"Nice to have" personal data, but is for interest rather than necessary for WSC to hold	<u>Consent</u> . We will seek a member's consent on the form seeking such information. The member may withdraw their consent at any time by contacting us by e-mail or letter.
AA	Publishing personal information of members, in e.g. Lobster Log articles, additional to that needed for the operation of the Club.	Providing personal contact information for informative reasons, i.e. not essential for the legitimate interests of operating WSC.	<u>Consent</u> . Those responsible for publishing such additional personal information (e.g. in a Lobster Log article), must first obtain the consent of those persons referred to.

Queries

Any queries concerning this policy, and suggestions for its improvement, are to be made to the WSC Honorary Secretary.

NRJ Hiscock for Executive Committee

Version 4.0 dated 9 April 2018