



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 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 our website <http://slyc.co.uk> or our Club noticeboard 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 Strangford Lough Yacht Club. We can be contacted at Strangford Lough Yacht Club, Whiterock, Killinchy, Co Down, BT23 6QA, E: office@slyc.co.uk
T: 028 9754 1883

3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
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 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 Performing the Club's contract with the Member.

Date of birth / age related information	Managing membership categories which are age related	
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 required by Sports Councils.
The Member's name, boat name and sail number	Managing race entries and race results.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club.
	Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.	For the purposes of our legitimate interests in promoting the Club.
	Allocating moorings and compound spaces.	
Photos and videos of Members and their boats	Putting on the Club's website and social media pages and using in press releases.	For the purposes of our legitimate interests in operating 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 or letter. Photographs of individuals under 18 years also subject to the Safeguarding and Child Protection Policy
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 consent.

The Member's name and e-mail address	Creating and managing the Club's online Membership Directory.	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.
Bank account details of the member or other person making payment to 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 a year 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 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	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	For the purposes of our legitimate interests in operating and promoting the Club

Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers
Collection of images and data from security cameras	Security of the club and members belongings	For the purposes of our legitimate interests in ensuring security

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 including physically restricted access, Logon and password protection with database regularly backed up to an external secure device.
- 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, 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 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 Our third-party providers will include N.I. local Authorities (including PSNI), RYANI, Sport NI, our appointed Accountants and Solicitors and HALs Race Results

- 5.4 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.
- 5.5 We may share non-personal statistical or summary information with other organisations working in partnership (e.g. the Royal Yachting Association or SportNI aligned to the Club Mark Accreditation)
- 5.6 Our website collects cookies to improve your browser experience and links to other websites run by other organisations. The privacy policy applies only to our website and we cannot be responsible for the privacy policy or practices of other sites even if you access them using links from our website. If you link from a third-party site, we cannot be responsible for that site and recommend that you check their privacy policy for details of how they store and use your data.
- 5.7 **16 or Under** We are committed to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian to consent to provide your personal information on your behalf.

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 Clubs' 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 and supplementary information so to be aware of and verify the lawfulness of the processing
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected if it is inaccurate or incomplete
- (d) to have your personal data erased in certain circumstances where there is no compelling reason for its continued processing
- (e) to object to or restrict how your personal data is processed

- (f) to have obtain and reuse your personal data for your own purpose across different services
- (g) to object to processing your personal data if it is for: processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purpose of scientific/historic research and statistics

7.2 The GDPR provides safeguards for individuals against the risk that a potentially damaging decision is taken without human intervention. Identify whether any of your processing operations constitute automated decision making and consider whether you need to update your procedures to deal with the requirements of the GDPR

7.3 We are required to make it as easy to withdraw consent as to give consent

7.4 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

T: 028 9027 8757 or T: 0303 123 1113 or E : ni@ico.org.uk

Information Commissioner's Office
3rd Floor
14 Cromac Place
Belfast BT7 2JB

For more details, please address any questions, comments and requests regarding our data processing practices to Colin Cushley, Strangford Lough Yacht Club, Whiterock, Killinchy, Co Down, BT23 6QA, E: office@slyc.co.uk

Review of this policy

We keep this policy under regular review as required to take into account changes in legislation and the experience of the policy in practice. This Policy was last updated in July 2018