

KIELDER YACHT CLUB DATA PRIVACY POLICY

It relates to compliance with the General Data Protection Regulation (GDPR) which comes into effect on 25 May 2018. The Club:-

- has a website on which the Club posts photos of events and members.
- has an online membership directory which is accessible by members only. (The policy does not address the issues relating to a hard copy membership directory.)
- has no sponsors
- allows members to bring guests (but there is no record of the guest's details and therefore no use made of guest data)
- does not use any of the personal data it collects for marketing purposes (except to update members about Club events)

The Policy assumes that the only personal data collected by the Club is:

- each member's name, address, phone numbers, e-mail addresses, emergency contact details as part of the rules for joining the Club.
- each member's boat name(s) and other craft
- suppliers details, club officers, committee members contact details

The Policy assumes that the purposes for which the personal data is collected are:

- managing each member's membership
- creating and managing an online membership directory
- posting photos of Club events, members and their boats to the Club's website and newsletter. Information for yearly handbook and social media pages. No data is collected via cookies on the website.

DATA PRIVACY POLICY

1. About this Policy
 - 1.1 This policy explains when and why we collect personal information about our members, 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 www.kielderyachtclub.com 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 Kielder Yacht Club. We can be contacted via the website contact page found at www.kielderyachtclub.com or telephone 01435 250273 when the club house is occupied
3. What information we collect and why.
 - 3.1 We collect names, addresses, contact details, email addresses along with craft details for the purpose of running and operating the club membership with the view of performing the Club’s contract with the Member.
 - 3.2 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.
 - 3.3 Putting on the Club’s website and social media pages and using in press releases.
 - 3.4 Creating and managing the Club's online Membership Directory.
 - 3.5 Consent. We will seek the Member’s consent on their annual membership application 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 or receiving social event emails.
 - 3.6 We do not collect any bank account details of the member or other person making payment to the Club
 - 3.7 Managing the Member’s and their dependants’ membership of the Club, the provision of services and events.
 - 3.8 Performing the Club’s contract with the Member.
 - 3.9 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 unless any outstanding issues with their membership still stands.

- 4 How we protect your personal data
 - 4.1 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
 - 4.2 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.
 - 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.
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
- (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/>

0303 123 1113.

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

Change Log – Sent to Committee for comment 21.5.18