

DATA PROTECTION PRIVACY POLICY

ABOUT THIS POLICY

This policy explains why we collect personal information about our members, instructors, staff, volunteers & visitors who purchase certain services from us, how we use it, how we keep it secure, and your rights in relation to it.

We may collect, use and store your personal data, as described in this Data Privacy Policy.

We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website thyc.org.uk or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

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.

WHO WE ARE

We are Tees & Hartlepool Yacht Club Limited. We can be contacted at The Clubhouse, West Harbour, Hartlepool TS25 0SP, info@thyc.co.uk or 01429 233423

Typically we collect data in order to provide services that you, as a member or user request or purchase from us. We collect & process your data via your application or renewal form when you become a member of Tees & Hartlepool Yacht Club, or, when you hire a room or book a training course with us.

Before we can collect or process your data we must inform you of our lawful basis for doing so. Our lawful basis are:

Legal obligation: The processing is necessary for us to comply with the law, for example providing accurate accounts

Contract: The processing is necessary for any contract we may have with you, for example hiring a room.

Legitimate Interest: It is in the best interests of the Club & the individual that we hold your data. For example your sail number so that you can be identified when racing

Consent: Before we process your data, you agree to us doing so, for example by subscribing to the club newsletter.

WHAT INFORMATION WE MAY COLLECT ABOUT YOU & WHY

- Name(s)
- Address
- Phone number
- Email address
- Bank account details

We have your name & address to meet our **legal obligations** required in the interests of running the Club, we need contact details to form **contracts** with members & visitors when hiring a room or taking a training course.

It is in our **legitimate interest** to hold contact details such as your phone number &/or email address so that we can contact you in case of emergency, for example if your boat requires attention.

It is in our **legitimate interest** to hold your bank account details depending on how you pay your fees or, if we need to pay you, for example if you are a member of staff.

If you are taking part in an organised event or training course or you are under 18 we may ask for data relating to:

- Your date of birth
- Your next of kin
- Any medical condition you feel we should know about

We will ask for your **consent** & where appropriate, your **explicit consent** enabling us to manage membership categories or training courses that are age related & to protect the vital interests of you & your family in an emergency.

If your training course leads to RYA certification your name, contact details, DOB, certificate number & date of issue will be shared with the RYA as a record of your qualification, & for verification or replacement of certificate if required. Details may also be used for quality assurance of RYA training.

If you have a boat:

- Boat name
- Sail number
- Call sign

For the purpose of our **legitimate interests** in: racing, promoting & operating the Club, managing race entries & providing results. Sharing results where applicable with class associations, media or the RYA.

For the allocation of moorings or compound storage & collection of fees

If you are an instructor, volunteer or member of staff we may ask to see your:

- Relevant qualifications
- Details of experience

For the purpose of our **legitimate interests** in running the Club & in training & events management at the Club

Information which may be published on the website & other media:

- Committee members names & how to contact
- Training Principal's name & how to contact

Published as points of contact in the **legitimate interest** of operating & promoting the Club

Website & marketing

- Photos and videos of members and their boats, visitors or trainees

Consent. We will ask permission on training course applications.

By signing the membership form you agree to be contacted by the club for the purposes of legitimate club business. i.e. promotions, events, club business and important information regarding your membership.

Consent may be withdrawn at any time by clicking 'unsubscribe' from emails, or by emailing unsubscribe@thyc.org.uk

HOW WE PROTECT YOUR PERSONAL DATA

We will not transfer your personal data outside the EU without your consent.

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. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

For any payments which we take from you online we use a recognised online secure payment system.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk

WHO ELSE HAS ACCESS TO INFORMATION WE HOLD ABOUT YOU?

We will never sell your personal data. We share your personal data with third parties where it is our **legal obligation** to do so, for example our accountants, or where there is a **legitimate interest** to do so, for example our bank.

We may pass your personal data to club officials for the purposes of providing services to you on our behalf, for example: sending out your renewal form or AGM notice. 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 club officers to deliver their 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.

HOW LONG DO WE KEEP YOUR INFORMATION?

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.

We securely destroy all financial information once we have used it and no longer need it.

YOUR RIGHTS

- The right to be informed
For example: This document informs you what we do with your personal data. If we decide to make changes that alter the way we process your data we will inform you.
- The right to access

You have the right of access to your personal data held by us. This is to be supplied by us within one month of the request & must be in a transferable format for example a .csv file.
- The right to rectification
You have the right to ask for incorrect data we hold about you to be rectified; we must comply within one month & also inform any third party who may have had access to the data in question.
- The right to erasure
This allows a member to request the deletion of data held about them, for example:
 - If there is no longer a legal obligation for the information to be held
 - If you withdraw your consent
 - The personal data must be erased to comply with a legal obligation
- The right to restrict processing

You have the right to ask the data holder to restrict the processing of your data. For example, if you contest the accuracy of the data held about you.

- The right to data portability

You have the right to obtain and reuse your personal data for your own purposes, allowing easy IT transfer across different services.

- The right to object

Although this relates to more specific types of data such as research or scientific, you may object to us processing your data on grounds that 'relate to your particular situation'.

OUR RIGHTS

- We may charge 'a reasonable fee' if a request is repetitive or excessive
- We may refuse to respond if the request is manifestly unfounded or excessive
- We can refuse erasure if data is required by us to fulfil our legal obligations

PUBLICITY & MARKETING

- You may **consent** to communications sent by email that are of interest to you, like Newsletters, details of forth coming events, or your views & comments on the services we provide.
- Your comments or images may be used for publicising Tees & Hartlepool Yacht Club

We must keep a record of your current options. All publicity related communications have a visible & easily accessible means of unsubscribing

It is in our **legitimate interest** to publish photographs of members, boats, visitors & activities for promotional purposes, this *may* include the Club website, social media, local press or TV however, if you are the only subject of a photograph we will seek your **consent** before publishing.

WEBSITE

When you access our website, your visit is recorded by the webhosting company Wix.com for statistical purposes. That information is then sent to us on a monthly basis. This is in our **legitimate interest**, helping us form useful analysis of preferences. The data collected does not identify you, it tells us the number of pages accessed, the types of device & browsers used, & geographic locations, e.g UK, Europe etc.

By browsing our website no identifying personal data is collected by THYC.

Tees & Hartlepool Yacht Club Limited

If you require any further information please contact: publicity@thyc.org.uk