1. **About this Policy**

1.1 This policy explains when and why we collect personal information about our members, their parents or guardians 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 https://www.tbsc.co.uk regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the [General Data Protection Regulation](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/) (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner https://ico.org.uk/ For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

1. **Who are we?**

2.1 We are Tankerton Bay Sailing Club. We can be contacted at Marine Parade, Tankerton CT5 2LQ or via the Club Commodore *commodore@tbsc.co.uk* or on *07973 449936*

1. **What information we collect and why.**

3.1 **Type of Information**

 Member's name, address, telephone numbers, e-mail address(es)

 **Purposes**

Managing the Member's membership of the Club

 Managing the duty roster

 **Legal basis of processing**

 Performing the Club's contract with the Member

 For the purposes of our legitimate interests in operating the Club.

3.2  **Type of Information**

 The names and ages of the Member's dependants.

 **Purposes**

 Managing the Member's and their dependants' membership of the Club

 **Legal basis of processing**

Performing the Club's contract with the Member.

3.3  **Type of Information**

 Emergency contact details

 **Purposes**

Contacting next of kin in the event of emergency

 **Legal basis of processing**

Protecting the Member's vital interest and those of their dependants.

3.4  **Type of Information**

 Date of birth / age related information

 **Purposes**

Managing membership categories which are age related

 **Legal basis of processing**

Performing the Club's contract with the Member.

3.5  **Type of Information**

 Gender

 **Purposes**

Provision of adequate facilities for members.

 Reporting information to the RYA.

 **Legal basis of processing**

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.

 For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.

3.6  **Type of Information**

The Member's name, boat name and sail number

 **Purposes**

Managing race entries and race results

 Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.

 Allocating boat storage location and compound spaces.

 **Legal basis of processing**

For the purposes of our legitimate interests in holding races for the benefit of members of the club.

 For the purposes of our legitimate interests in promoting the Club.

 For the purposes of our legitimate interests in operating the Club.

3.7  **Type of Information**

Photos and videos of members and their boats

 **Purposes**

Putting on the Club's website and social media pages and using in press releases.

 **Legal basis of processing**

Consent. We will seek the Member's and/or parents or guardians consent on their membership application form and each membership renewal form and the Member or their parent or guardian may withdraw their consent at any time by contacting us by e- mail or letter.

3.8  **Type of Information**

Radio call signs

 **Purposes**

Collected for a rally and shared between those participating in the rally.

 **Legal basis of processing**

For the purposes of our legitimate interests in ensuring that boats on a rally can maintain contact with each other

3.9 **Type of Information**

Member's name and e-mail address(es)

 **Purposes**

Creating and managing the Club's online Membership Directory.

 **Legal basis of processing**

Consent. 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 email or letter to tell us that they no longer wish their details to appear in the Membership Directory.

3.10 **Type of Information**

Bank account details of the member or other person making payment to the Club

 **Purposes**

Managing the Member's membership of the Club, the provision of services and events.

 **Legal basis of processing**

Performing the Club's contract with the Member.

3.11 **Type of Information**

Member's name and e-mail address(es), whilst a current member and the Club and for as long afterwards as is necessary to comply with our legal obligations after ceasing to be a member of the club.

 **Purposes**

Passing to the RYA for the RYA to conduct surveys of members of the Club and former members of the Club. See paragraph 5.3 below

 **Legal basis of processing**

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.

3.12 **Type of Information**

Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.

 **Purposes**

Managing instruction at the club.

 **Legal basis of processing**

For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.

3.13 **Type of Information**

Name, e-mail address and telephone number of each Club Officer and Club Committee Member.

 **Purpose**

 Information published on Club's website, in the 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.

 **Legal basis of processing**

 For the purposes of our legitimate interests in operating and promoting the Club.

3.14**Type of Information**

Employees and representatives of suppliers to the club.

 **Purpose**

 Entering into and managing arrangements with suppliers..

 **Legal basis of processing**

 Entering into and performing contracts with suppliers.

1. **How we protect your personal data**

4.1 We will not transfer your personal data outside the European Union (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.

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 required to do so by law or as set out in the Section 3 above or 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 to 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 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 information secure and not to use it for their 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 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/> Tel 0303 123 1113.

 Information Commissioner's Office,

 Wycliffe House, Water Lane,

 Wilmslow,

 Cheshire

 SK9 5AF

 For more details, please address any questions, comments and requests regarding our data processing practices to Tankerton Bay Sailing Club Marine Parade, Tankerton CT5 2LQ or via the Commodore *commodore@tbsc.co.uk* or on *07973 449936.*