



Harlow (Blackwater) Sailing Club

Data Processing Policy

Approved by H(B)SC Management Committee April 2018
(Updated January 2021 to include messenger groups)

1. About this Policy

- 1.1 This policy explains why we (Harlow (Blackwater) Sailing Club) collect personal information about club members, how we use it and how we keep it secure and club members 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 club members.
- 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 <http://harlow-blackwater-sailing-club.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). The committee will act as 'data controller' and determine the purposes and means of the processing of personal data.

2. What personal information we collect and why

Type Of Information	Purposes
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Managing the duty roster and e-mailing members Club information. The club will seek consent in the renewal/application form for use of this information in accordance with this policy. A hard copy list of contact details will be kept in a secure location in the clubhouse in case of emergency.
The names and ages of the Member's dependants.	Managing the Member's and their dependants' membership of the Club.
Gender (title)	Provision of adequate and suitable facilities (including changing rooms and toilets) for members. Reporting gender data to the RYA and sports councils.
The Member's name, boat name and sail number	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. Management and allocation of spaces within dinghy and cruiser parks.
Photos and videos (images) of members.	Putting on the Club's website and social media pages and using in press releases. A personal image is one where it is possible to identify an individual from information within the image or text associated with the image e.g. names of prize winners. We will ask Member's to give explicit consent (opt-in) for the use of personal images on the membership renewal/application form. Non-personal images may be used without explicit consent but with due consideration to the individuals. Members may withdraw their consent at any time by contacting us by email or letter.
Suppliers address, email addresses, phone numbers.	Managing day to day operation of club operations.

3. How we protect your personal data

- 3.1 The membership secretary will process membership information electronically and hold all information on a database on a secure computer. Membership forms will be held in a secure cabinet. Other members of the committee may hold a copy of the database, or information from the database in a secure manner.
- 3.2 Please note that transmission of information over the internet can never be guaranteed to be 100% secure.
- 3.4 We will notify members promptly in the event of any breach of your personal data.
- 3.5 We will never sell members personal data. We will not share members personal data with any third parties without prior consent (which you are free to withhold) except where required to do so by law.

4. How long we keep membership information

- 4.1 We will hold your personal data on our systems for as long as you are a member of the Club and for 3 years after they have left the club unless 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.

5. Messenger Groups

Messenger groups such as WhatsApp set up in the name of H(B)SC, or to manage activities of H(B)SC, will comply with the following:

- 5.1. Members of the group will be invited to join via a link or, if requested by a member, added by the group administrator. Members therefore give their implicit consent to the terms and conditions of the messaging app being used.
- 5.2 In the case of those aged under 18 years the parent or guardian must consent to their joining a group.
- 5.3 In order to protect member's personal data such as phone numbers the groups will be open to H(B)SC members only with the following exceptions:
 - 5.3.1 A representative from Maylandsea Bay Sailing Club (MBSC) may join a group related to Club activities such as sailing, kayaking etc.
 - 5.3.2 A joint group may be set up between H(B)SC and MBSC in which case it will be open to members of both Clubs.
- 5.4 Members of any messenger group must follow a code of conduct which includes
 - 5.4.1 A messenger group is there to facilitate and promote the activities and aims of H(B)SC. As such the group should not be used to promote any political or religious agenda.
 - 5.4.2 Members should assume any message they post might appear in print and should not post any message that would cause hurt, offence or embarrassment to an individual or would cause reputational damage to the Club.
- 5.5 H(B)SC messenger groups may only be created with the agreement of the committee who may, at any time, direct that a particular group is discontinued.

6. Members rights

6.1 You have rights under the GDPR:

6.1.1 to access your personal data

6.1.2 to be provided with information about how your personal data is processed

6.1.3 to have your personal data corrected

6.1.4 to have your personal data erased in certain circumstances

6.1.5 to object to or restrict how your personal data is processed

6.1.6 to have your personal data transferred to yourself or to another business in certain situations.

6.2 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

For more details, please address any questions, comments and requests regarding our data processing practices to clubsec@harlow-blackwater-sailing-club.com