



CONWAY YACHT CLUB 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 [www.conwayyachtclub.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 Conway Yacht Club We can be contacted at Conway Yacht Club, 43 Station Road, Deganwy, LL31 9DF - Telephone 01492 583690.

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. | Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club. |
| 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. |

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| | Reporting information to the RYA and WSRA. | For the purposes of the legitimate interests of the RYA/ WRSA to maintain diversity data as required by Sports Councils |
| Photos and videos of Members and their boats | Putting on the Club's website and social media pages and using in press releases. | Consent - the Member may withdraw their consent at any time by contacting us by e-mail or letter. |
| 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 |
| 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. |

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| 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 RYA/ WSRA to carry out 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/ WSRA in their capacity as national governing bodies for boating/ rowing. |
| 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 RYA/ WSRA 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 |

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.
- 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 We may also pass your personal data to the RYA/ WSRA for the purposes of surveys when it is in the legitimate interest of the Club and the RYA/ WSRA to do so. The RYA/ WSRA may use third parties to carry out the surveys but will disclose only personal data strictly required for this to take place and will have a contract in place to ensure that data is not used for any other purpose.

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

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager – Gail Wolstenholm at membership@conwayyachtclub.com

If you have any queries, questions or comments on the information contained in this leaflet, kindly contact the Legal Team on 023 8060 4223 or legal@rya.org.uk

RYA Responsibility Statement:

The RYA Legal Team provides generic legal advice for RYA members, affiliated clubs, class associations and Recognised Training Centres. The information contained in this Guidance represents the RYA's interpretation of the law as at the date of this edition. The RYA takes all reasonable care to ensure that the information contained in this Guidance is accurate and that any opinions, interpretations and guidance expressed have been carefully considered in the context in which they are expressed. However, before taking any action based on the contents of this Guidance, readers are advised to confirm the up to date position and to take appropriate professional advice specific to their individual circumstances.