**WORMIT BOATING CLUB & WATERSPORTS HUB**
**DATA PRIVACY POLICY**

## 1. About this Policy

1.1. This policy explains when and why we collect personal information about our members, visitors 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.wormitboatingclub.org.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***). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

1.5. We will follow five steps to ensure that data protection obligations associated with supporting any various legitimate schemes in the UK are not a barrier :

1. Ask only for what is needed
2. Be transparent, clear, open and honest
3. Carefully store the data we collect
4. Don't use data for other purposes
5. Erase it in line with government guidance

## 2. Who are we?

2.1. We are Wormit Boating Club & Watersports Hub. We can be contacted by email at admin@wormitboatingclub.org.uk, in person by visiting Woodhaven Pier, Wormit during a programmed event or by contacting a committee member by phone / email / text as appropriate.

## 3. What information we collect and why

| Type of Information | Purposes | Legal Basis of Processing |
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| Member's name, address, telephone numbers, e-mail address, whilst a current member and for up to 1 year after conclusion of any post- membership Club related business. | Managing the Member's membership of the Club.<br>Managing the duty roster.<br>Managing post membership business e.g. outstanding fees or vessel removal | Performing the Club's contract with the Member.<br>For the purposes of our legitimate interests in operating the Club |
| The names and ages of the Member's dependants. | Managing the Member's and their dependants' membership of the Club. | Performing the Club's contract with the Member. |
| Emergency contact details | Contacting next of kin in the event of emergency. | Protecting the Member's vital interests and those of their dependants |
| Date of birth / age related information. | Managing membership categories which are age related. | Performing the Club's contract with the Member.<br>.<br>.<br>Member may |
| Gender | Provision of adequate facilities for members.<br><br>Reporting information to the RYA. | 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<br><br>For the purposes of the legitimate interests of the RYA, to maintain |

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| | | diversity data required by Sports Councils |
| The Member's name, boat name and sail number | Managing race entries and race results.<br><br>Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media<br><br>Allocating moorings and compound spaces. | For the purposes of our legitimate interests in holding races for the benefit of members of the Club.<br>For the purposes of our legitimate interests in promoting the Club.<br><br>For the purposes of our legitimate interests in operating the Club. |
| Photos and videos of Members, and their boats. | Putting on the Club's website and social media pages and using in press releases. | **Consent.** We will seek the Member's consent on their membership application form and each membership renewal and the Member may withdraw their consent at any time by contacting us by e-mail or letter.<br><br>Photos and/ or videos of young people under the age of 16 years ***will not*** be used to promote the club unless parental written consent is approved. If used, these should focus on activity, show appropriate clothing and avoid naming children as per GDP guidelines. |
| 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 in a |

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| | | rally can maintain contact with each other. |
| The Member's name and e-mail address. | Creating and managing the Club's Member Directory | **Consent:** We will seek the Member's consent on their membership application form and each renewal. The Member may withdraw their consent at any time by contacting us by emails or letter to tell us that they no longer wish their details to appear in the Member Directory. |
| The Member's name and e-mail address, whilst a current member and for up to 1 year after ceasing to be a member of the Club | Passing to the RYA for the RYA to conduct 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 in its capacity as the national body for all forms of watersports. |
| Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience. | Managing instruction at the Club. | For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to Members |
| 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 the RYA, in each case 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. |

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| Employees and representatives of suppliers to the Club. | Entering into and managing arrangements with suppliers. | Entering into and performing contracts with suppliers. |
| Name, e-mail address and telephone number of local stakeholders and community group representatives or sponsors (Stakeholder). . | Marketing and promotion of relevant events and news. | **Consent.** We will seek consent annually by email (positive opt-in). The Stakeholder 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 be held or used. |
| Member's and visitor's name, address, telephone number, date and time of attendance for participation in activities or performance of club duties, either scheduled or ad-hoc. | We will only share this data when requested by a legitimate public health authority (e.g. as in COVID or similar tracing). Data collected will be retained for 21 days then securely disposed of. | Legal obligation. We need to collect personal information to comply with a statutory obligation in Scotland. |

**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. 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 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 your information secure and not to use it 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. Data collected for the purposes of contact tracing (COVID-19), will be retained for 21 days.
6.3. 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/**

**The Information Commissioner's Office - Scotland**
**45 Melville Street**
**Edinburgh**
**EH3 7HL**
**0303 123 1113**

For more details, please address any questions, comments and requests regarding our data processing practices to admin@wormitboatingclub.org.uk