



DATA PRIVACY POLICY

Members, Visitors & Applicants

About this Policy

This policy explains when and why we collect personal information about our members, applicants and visitors, how we use it and 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 and as described when we collect data from you.

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

We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. This Policy reflects the GDPR but the omission of any item from this Policy does not mean that we will not comply with the GDPR in that or any other regard. 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 are we?

We are the Royal Air Force Yacht Club. We can be contacted at:

Riverside House
Rope Walk
Hamble
Southampton SO31 4HD

023 8045 2208

office@rafyc.co.uk

RAFYC – Data Privacy Policy (Members, Visitors & Applicants)

The information we collect and why

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	<p>Managing the Member's membership of the Club.</p> <p>Managing the volunteering duty roster.</p>	<p>Performing the Club's contract with the Member.</p> <p>For the purposes of our legitimate interests in operating the Club.</p>
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	<p>Managing membership categories which are age related</p> <p>Reporting information to the RYA.</p>	<p>Performing the Club's contract with the Member.</p> <p>For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.</p>
Gender	<p>Provision of adequate facilities for members.</p> <p>Reporting information to the RYA.</p>	<p>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.</p> <p>For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.</p>

RAFYC – Data Privacy Policy (Members, Visitors & Applicants)

Type of information	Purposes	Legal basis of processing
Members' names, boat names and sail numbers	<p>Managing rally and race entries and race results.</p> <p>Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.</p>	<p>For the purposes of our legitimate interests in holding rallies and races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in operating and promoting the Club</p>
Photos and videos of Members and their boats	Putting on the Club's website and social media pages and using in press releases.	We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us. Photographs of children will require the specific written consent of a parent or legal guardian.
Members' names, Boat names, Radio call signs, Email addresses, Mobile Telephone numbers and MMSI	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
Members' names, Boat names, Radio call signs, Email addresses, Mobile Telephone numbers and MMSI	Creating and managing the Club's online Membership Directory.	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 to tell us that they no longer wish their details to appear in the Membership Directory.
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.

RAFYC – Data Privacy Policy (Members, Visitors & Applicants)

Type of information	Purposes	Legal basis of processing
Name and e-mail address of each Club committee member	Information published on Club's website	For the purposes of our legitimate interests in operating and promoting the Club
Member's and former member's name and e-mail address	Management of further applications or passing to the RYA for the RYA to conduct surveys of Members and former members of the Club (and other clubs affiliated to the RYA). The surveys are for the benefit of the Clubs (and other clubs) and / or the benefit of the RYA.	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.
Visitors attending Regattas, using accommodation, berths etc. Names, contact details and vessel.	Allowing notification of changes in facilities and of future events and facilitating participation in future events.	For the purposes of our legitimate interests in operating the Club and its facilities.
Members' relevant qualifications and/or experience.	Managing volunteering at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering to volunteer and provide details of volunteers to members coordination work.
Names and contact details of Applicants for Membership who do not proceed to membership.	Allowing management of future applications.	For the purposes of our legitimate interests in operating the Club by allowing for follow up or renewal of applications.
Names and Dates of Birth of Expelled Members	Prevention of rejoining the Club.	For the purposes of our legitimate interests in operating the Club by prevention re-joining and avoiding a contravention of our Articles.
Names, addresses and affiliations of Visitors, as entered in the Visitors'	To comply with the limit of 6 visits per annum in accordance with Club	For the purposes of our legitimate interests in operating the Club.

RAFYC – Data Privacy Policy (Members, Visitors & Applicants)

Type of information	Purposes	Legal basis of processing
Book	Rule 4.2	
Name and phone number of club users	To expedite Track & Trace in the event of an outbreak of COVID19 at the club	Comply with Government Guidance during the COVID19 pandemic

How we protect members' 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 will 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 the information that members provide us?

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 the paragraphs below.

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.

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

RAFYC – Data Privacy Policy (Members, Visitors & Applicants)

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, see Appendix 1. 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

You have rights under the GDPR:

- 1.** to access your personal data
- 2.** to be provided with information about how your personal data is processed
- 3.** to have your personal data corrected
- 4.** to have your personal data erased in certain circumstances
- 5.** to object to or restrict how your personal data is processed
- 6.** to have your personal data transferred to yourself or to another business in certain circumstances

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow
Cheshire SK9 5AF

0303 123 1113

<https://ico.org.uk/concerns/>

For more details, please address any questions, comments and requests regarding our data processing practices to our Honorary Secretary at HonSec@rafyc.co.uk

Information Breaches

A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made

RAFYC – Data Privacy Policy (Members, Visitors & Applicants)

unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed.

If a personal data breach has occurred, we will take steps to establish the likelihood and severity of the resulting risk to people's rights and freedoms. The Data Protection Manager, the Honorary Secretary and the Vice-Commodore will be notified and the decision and the reasons for it will be documented.

If it is determined that a risk is likely, we will notify the ICO within 72 hours. We will assess both the severity of the potential or actual impact on individuals as a result of a breach and the likelihood of this occurring. If the impact of the breach is more severe, we will promptly inform those affected, particularly if there is a need to mitigate an immediate risk of damage to them.

We will prioritise the investigation of the breach, giving it adequate resources and expediting the process.

Individual's Requests

Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing. This includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete. Individuals have the right to have personal data erased, the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

We will respond to requests in one month. We will provide a copy of the information free of charge, unless a request is manifestly unfounded, excessive or repetitive.

If the request is for rectification, we will take reasonable steps ensure that the data is accurate and to rectify the data if necessary.

We will erase data if:

- 1.** The personal data is no longer necessary for the purpose which we originally collected or processed it for.
- 2.** We are relying on consent as your lawful basis for holding the data, and the individual withdraws their consent.
- 3.** We are relying on legitimate interests as your basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing.
- 4.** We are processing the personal data for direct marketing purposes and the individual objects to that processing.
- 5.** We have processed the personal data unlawfully

APPENDIX 1. Guidance on Retention Periods and Disposal

1. Disposal methods will be used in accordance with good commercial practice. These include shredding of paper copies and the deletion of computer files.
2. Applicants who do not proceed with membership, 12 months. Reason, to allow for follow up or renewal of application.
3. Resigned members, 12 months following the 30th of December in the year of resignation (Article 9.1). Reason: to facilitate reapplication and exit or satisfaction surveys.
4. Rejected applicants, 18 months. Reason: to inform any re-application.
5. Verbal Warnings following Disciplinary Process, 2 years. Reason; to inform any recurrent or new disciplinary issues.
6. Written Warnings following Disciplinary Process, 3 years. Reason; to inform any recurrent or new disciplinary issues.
7. Expelled Members, permanent record. Reason; to prevent re-joining.
8. Visitors and Regatta Entrants, 2 years Reason; to facilitate participation in future events.
9. Legal claims, tort 6 years, personal injury 3 years. Reason; in order to allow proper participation in any proceedings.
10. Visitors Book, 2 years. Reason; to comply with the limit of 6 visits per annum in accordance with Club Rule 4.4
11. COVID track/trace data will be destroyed after 21 days