Data Privacy Policy V3

1. About this Policy

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.
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.
3. We reserve the right to amend this Data Processing Policy from time to time without prior notice. Any amendments will be published on our website www.wivenhoesailingclub.org or our Club notice board. Amendments will not apply retrospectively.
4. We will always do our best to comply with the General Data Protection Regulations (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (ico.org.uk). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

2. Who are we?

We are **WIVENHOE SAILING CLUB**. We can be contacted at Wivenhoe Sailing Club, Walter Radcliffe Road, Wivenhoe, Essex CO7 9WS Email

3. The club may collect some or all of the following information 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. Managing the duty roster.	Performing the Club's membership agreement with the Member. 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 membership agreement 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 membership agreement with the Member.
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.
	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
The Member's name, boat name and sail number	Managing race entries and race results.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club.

Photos and/or videos of members of the public and club members and/or their boats including those taken on club premises and at club events.	Putting on the Club's website and social media pages and using in press releases.	For the purposes of our legitimate interests in running and promoting the club. If anyone objects to their image being used in this way, they may ask the Data Controller to have those images removed.
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 membership agreement with the Member.
Member's name and e- mail address	Passing to the RYA for the RYA to conduct surveys of members of the Club (and members of 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
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, contact details, date of birth, identity document details, and DBS certificate information (including certificate number, date of issue, type of check, position applied for, unique reference	Safer recruitment: assessing the suitability of volunteers for roles involving regular responsibility for, or contact with, children or adults at risk. Applications are processed via the RYA as the club's registered	Legitimate interests (safer recruitment and safeguarding of children and adults at risk) and legal obligation (Safeguarding Vulnerable Groups Act 2006; DBS Code of Practice). Processing of criminal records data is authorised under Schedule 1 of the Data Protection Act
number, and the recruitment decision taken) for volunteers in roles requiring a DBS check.	umbrella body, using the RYA Employmentcheck system. DBS certificate information is handled strictly in accordance with the DBS Code of Practice and the club's Safeguarding Policy.	2018 (safeguarding of children and individuals at risk).
Records of Club Boat Scheme usage	To keep records and manage the Club Boat Scheme	For the purposes of our legitimate interests in operating the Club Boat Scheme

Note: DBS certificate information is retained only for as long as necessary following a recruitment decision and is then securely destroyed. A record of the date of issue, name, type of check, position, unique reference number and decision may be retained in line with safeguarding best practice (default 7 years). No photocopy or image of any DBS certificate will be kept.

4. How we protect your personal data

1. We will not transfer your personal data outside the EEA without your consent.
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. We will notify you promptly in the

event of any breach of your personal data which might expose you to serious risk.

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. For any payments which we take from you online we will use a recognised online secure payment system.
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?

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 table above or paragraph 5.2 below.
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). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have an agreement in place that requires them to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

1. We will hold your personal data on our systems for as long as you are a member of the Club and afterwards for up to six calendar years. 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.
2. We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

1. 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.

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/

By post to: I**nformation 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. Email

By post: **Wivenhoe Sailing Club, Walter Radcliffe Road, Wivenhoe, Essex CO7 9WS**

Approved by General Committee 18th June 2026. Updated Nov 2026

This policy is based on the TEMPLATE DATA PRIVACY POLICY provided by the RYA in 2017 and modified to take account of local circumstances

Data Policy

Wivenhoe Sailing Club
Walter Radcliff Road, Wivenhoe, CO7