



## **DRAYCOTE WATER SAILING CLUB DATA PRIVACY POLICY**

(updated 9<sup>th</sup> July 2020)

### **1. About this policy**

- 1.1 This policy explains when and why we collect personal information about our members, customers, visitors, suppliers, staff and contractors; how we use it; 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 websites [www.draycotewater.co.uk; www.draycoteview.co.uk] or our Club mailings 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 When a new project may impact on Data Protection, a Data Protection Impact Assessment will be carried out.
- 1.6 Consent will be recorded according to the Procedure for Recording Consent.
- 1.7 A Record of Processing Activity covers Special Category Data which is collected with explicit consent.

### **2. Who are we?**

- 2.1 We are Draycote Water Sailing Club Limited and our subsidiary: DWSC Trading Limited, which has a trading name of Draycote View.

We can be contacted at: Kites Hardwick, Nr Rugby, Warwickshire. CV23 8AB.

Tel: 01788 811153

E-mail: office@draycotewater.co.uk

- 2.2 We control official Club and Draycote View communication (like official website, Facebook page, Twitter feed and publications). We have no control over other websites or social media (whether unofficially linked to the Club or not) and cannot take responsibility for what appears on them, including re-posts of items from our official channels.

### **3. What information we collect and why**

Information collected, its purpose and the legal basis for processing are given below for the different categories of people we deal with. You may fall into more than one category. The categories are:

- All site / website visitors
- Club members / lapsed members / tenant
- Members' guests

- Affiliate members
- Sailing visitors / customers
- Non-sailing visitors / customers
- Children's birthday party visitors / customers
- Open Day visitors
- Suppliers
- Staff / instructors / contractors / youth club supervisors

### 3.1 All Site / Website Visitors

Type of information	Purposes	Legal basis of processing	Retention Period
Video taken by CCTV cameras	To ensure the safety & security of the site & protect the Club's assets. The images will be shared with the police where necessary.	For the purposes of our legitimate interests in operating the Club and protecting the Club's assets.	1 month
Accident information	To record accidents for our own review & as per the requirements of the First Aid & RIDOR Regulations.	For the purposes of our legitimate interests in operating the Club.	15 years after end of membership year
Photos & videos of members / visitors / customers (& their boats)  See also: - Section about Committee members / fleet captains / event race officials' images in Members' section. - Section about Staff / instructor / contractors' images in Staff / instructor / contractor section.	For use in the Club's internal & external publicity & promotional materials including press, websites & social media platforms.	Most images would not be classified as personal data. To be personal data "it must be possible to identify an individual from information within the image or text associated with the image... being recognised by family or friends is not the same as being identified". (Source: RYA). Where images are personal data, consent will be obtained before use. In such cases the individual may withdraw their consent at any time by contacting us by e-mail or letter but should be aware that: - It may not be possible for printed material to be taken out of circulation or altered until the next printing. - We can only remove images from the websites and social media that we control (see 2.2).	Until consent withdrawn
<u>Those making a payment:</u> Bank account details Credit card details	Managing the member's membership and / or the provision of services & events provided by the Club. These details are usually held by WebCollect and / or GoCardless who are Data Processors for us.	Performing the Club's contract with the member / visitor / customer.	6 years after end of membership year the transaction took place
<u>Data about use of website:</u> IP address Geographical location Browser type & version Operating system Referral source Length of visit Page views Website navigation paths Timing, frequency & pattern of use	To allow us to analyse use of the website. We would never tie this information to individuals, even though the information potentially enables us to do so.	For the purposes of our legitimate interests in operating the Club, specifically monitoring & improving our website.	Indefinite

### 3.2 Club Members / Lapsed Members / Tenant

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Lead member:</u> Name Address Telephone number(s) E-mail address(es) Car registration number(s) Correspondence  <u>Other family members covered by membership:</u> Name Address Telephone number(s) E-mail address(es) Car registration number(s) Correspondence	Managing the member's & family members' membership of the Club.	Performing the Club's contract with member(s).	15 years after end of membership year they ceased to be a member
	Creating & managing the Club's membership database on WebCollect who act as a Data Processor for us.	For the purposes of our legitimate interests in operating the Club.	
	Managing the duty roster on DutyMan who act as a Data Processor for us.	For the purposes of our legitimate interests in operating the Club.	
	Communicating with members about their membership & activities at the Club.	For the purposes of our legitimate interests in operating the Club.	
Passing name & e-mail address to the RYA or other bodies for them to conduct surveys of members & past members of the Club. The surveys are for the benefit of the Club and / or the benefit of the RYA.	For the purpose of our legitimate interest in operating the Club and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.		
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient & suitable facilities (including changing rooms & 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.	
Date of birth / age	Managing age related membership categories.	Performing the Club's contract with the member(s).	
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the member's vital interests & those of their dependants.	
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the member's vital interest.	
Usage of entry barrier & clubhouse (from access control system)	To monitor usage of the Club's facilities to ensure they are adequate.	For the purposes of our legitimate interests in operating the Club.	2 months after end of membership year
	To ensure the safety & security of the site & protect the Club's assets.	For the purposes of our legitimate interests in operating the Club.	
Record and outcome of disciplinary hearings	For the enforcement of the Club's rules & regulations.	For the purposes of our legitimate interests in operating the Club.	15 years after end of membership year they ceased to be a member
<u>Those with a boat:</u> Type of boat Sail number	Managing moorings & boat park spaces in accordance with the Regulations.	For the purposes of our legitimate interests in operating the Club.	

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Those going on the water:</u> Type of boat / board Sail number	To ensure we know who is on the water for safety reasons & as required by our lease.	For the purposes of our legitimate interests in operating the Club safely & meeting our lease obligations.	5 years after end of membership year
	To fulfil the reporting requirements for CASC.	For the purposes of our legitimate interests in operating the Club in line with the requirements for a CASC.	
<u>Those competing in races:</u> Type of boat Sail number Race results	Managing race entries, race results & the duty roster on DutyMan.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club.	Indefinite
	Sharing race results with other clubs, class associations & the RYA. Providing race results to local & national media.	Performing the Club's contract with the competitor to provide race entry & administration & the legitimate interests of the RYA in its capacity as the national body for all forms of boating.	
<u>Those involved in protests:</u> Type of boat Sail number Details of protest incident Decision of protest committee	Running racing & enforcing the Racing Rules of Sailing. This information will be passed to the RYA in the case on an appeal.	Performing the Club & RYA's contract with the competitor to provide race entry & administration according to the Racing Rules of Sailing.	2 months after end of membership year or until the appeal is resolved
<u>Those with a boat that they take away from Draycote:</u> Type of boat Sail number Location & date of last launch Location & date of next launch	To record that the boat has undergone the RYA Check, Clean, Dry process before launching at Draycote & will do so after sailing at Draycote.	For the purposes of our legitimate interests in operating the Club in accordance with the RYA & Severn Trent requirements.	2 months after end of membership year
<u>Those owing the Club money:</u> Amount owed	For the collection of debt & the enforcement of the Club's Rules & Regulations.	Performing the Club's contract with the member.	Until the debt has been paid
<u>Committee Members, Fleet Captains &amp; Event Race Officials</u> Telephone number(s) E-mail address(es) Photos & videos	Information published on the Club's website, noticeboards, Emergency Operating Procedures, Child Protection Manual, newsletters & other publications & marketing materials and made available to the RYA where appropriate as a point of contact at the Club.	For the purpose of our legitimate interests in operating & promoting the Club.	12 months after cease in role
<u>Committee Members &amp; Fleet Captains</u> Meeting minutes	To maintain a record of committee discussions & decisions.	For the purpose of our legitimate interest in operating the Club.	Indefinite

### 3.3 Member's Guests

Type of information	Purposes	Legal basis of processing	Retention Period
Name Member hosting them	Managing guests on site & complying with our licence requirements.	For the purposes of our legitimate interests in operating the Club & fulfilling our legal licensing requirements.	2 months after end of membership year

### 3.4 Affiliate Members

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Lead member(s):</u> Name Address Telephone number(s) E-mail address(es) Car registration number(s) Correspondence  <u>Other members covered by the membership:</u> Name	Managing the affiliate member's membership of the Club.  Communicating with members about their membership & activities at the Club.	Performing the Club's contract with the member(s).  For the purposes of our legitimate interests in operating the Club.	12 months after cease in role / cease to be a member
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the member's vital interests & those of their dependants.	
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the member's vital interest.	

### 3.5 Boating Visitors / Customers (Day sailing, SUPing, open meetings, training, corporate boating)

Type of information	Purposes	Legal basis of processing	Retention Period
Name Address Telephone number(s) E-mail address(es) Car make & registration number(s) Correspondence  <u>For under 18s:</u> Parent / guardian name Address Telephone number(s) E-mail address(es) Car make & registration number(s) Correspondence	Managing the provision of services & events provided by the Club.  Creating & managing the Club's customer database on WebCollect.  For marketing the Club & its activities.	Performing the Club's contract with the visitor / customer. For the purposes of our legitimate interests in operating the Club, its services & events.  For the purposes of our legitimate interests in operating the Club, its services & events.  Informed consent. We will seek the visitor / customer's consent on their registration / entry form.	15 years after end of membership year the last transaction took place  Until consent withdrawn
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the visitor / customer's vital interests & those of their dependants.	15 years after end of membership year the last transaction took place
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the visitor / customer's vital interest.	
<u>Those taking part in training courses:</u> Date of birth / age Gender	To enable us to provide the appropriate training & level of supervision.	For the purpose of our legitimate interests in operating the Club & running appropriate training courses.	Indefinite
<u>Those taking part in training courses:</u> Courses passed Date of course Certificate number	To keep a record of qualifications held for checking when required.	Performing the Club's contract with the customer.	

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Those taking part in PB2 training courses:</u> Address Date of birth Courses passed Date of course Certificate number	To supply this information to the RYA for their maintenance of records of people who have PB2 qualifications.	Performing the Club's & RYA's contract with the customer.	Indefinite
<u>Day sailors:</u> Type of boat / board Sail number	To ensure we know who is on the water for safety reasons & as required by our lease.	For the purposes of our legitimate interests in operating the Club safely & meeting our lease obligations.	2 months after end of membership year
<u>Those competing in races:</u> Type of boat Sail number Race results Sailing Club	Managing race entries & race results.	For the purposes of our legitimate interests in operating the Club, its services & events.	Indefinite
	Sharing race results with other clubs, class associations & the RYA. Providing race results to local & national media.	Performing the Club's contract with the competitor to provide race entry & administration & the legitimate interests of the RYA in its capacity as the national body for all forms of boating.	
<u>Those competing in races (as required by the event):</u> Gender Date of birth / age	To enable us to identify demographic groups which are being scored separately & share race results as above.	Performing the Club's contract with the competitor to provide race entry & administration.	
<u>Those involved in protests:</u> Type of boat Sail number Details of protest incident Decision of protest committee	Running racing & enforcing the Racing Rules of Sailing. This information will be passed to the RYA in the case on an appeal.	Performing the Club & RYA's contract with the competitor to provide race entry & administration according to the Racing Rules of Sailing.	2 months after end of membership year or until the appeal is resolved
<u>Those bringing a boat to Draycote Water:</u> Type of boat Sail number Location & date of last launch Location & date of next launch	To record that the boat has undergone the RYA Check, Clean, Dry process before launching at Draycote & will do so after sailing at Draycote.	For the purposes of our legitimate interests in operating the Club in accordance with the RYA & Severn Trent requirements.	2 months after end of membership year

### 3.6 Non-Sailing Visitors / Customers (Room hire, parties, etc.)

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Booker:</u> Name Address Telephone number(s) E-mail address(es) Correspondence	Managing the provision of services & events provided by the Club.	Performing the Club's contract with the visitor / customer. For the purposes of our legitimate interest in operating the Club, its services & events.	2 calendar years after cease to be customer
	For marketing the Club & its activities.	Informed consent. We will seek the visitor / customer's consent on their registration / entry form.	Until consent withdrawn
<u>For others covered by the booking:</u> Name Address Telephone number(s)			

E-mail address(es)			
<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>	<b>Retention Period</b>
Dietary requirements	In order to provide appropriate food for our visitors / customers.	For the purposes of our legitimate interest in operating the Club, its services & events.	2 weeks

### 3.7 Children's Birthday Party Visitors / Customers

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Booking parent:</u> Name Address Telephone number(s) E-mail address(es) Correspondence	Managing the provision of services & events provided by the Club.	For the purposes of our legitimate interests in operating the Club, its services & events.	2 months after end of membership year
<u>Each child:</u> Name Age  <u>Each child's parent:</u> Name Address Telephone number(s) E-mail address(es)	For marketing the Club & its activities.	Informed consent. We will seek the parent's consent on their registration / entry form.	Until consent withdrawn
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the guest's vital interests & those of their dependants.	2 weeks
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the guest's vital interest.	
Dietary requirements	In order to provide appropriate food for our visitors / customers.	For the purposes of our legitimate interest in operating the Club, its services & events.	

### 3.8 Open Day Visitors

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Lead person:</u> Name Address Telephone number(s) E-mail address(es)	Managing the provision of services & events provided by the Club.	For the purposes of our legitimate interests in operating the Club, its services & events.	3 months
<u>Others in the party:</u> Name Date of birth / age (under 18s)	For marketing the Club & its activities.	Informed consent. We will seek the visitor's consent on their registration / entry form.	Until consent withdrawn
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the visitor's vital interests & those of their dependants.	3 months
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the visitor's vital interest.	



### 3.9 Suppliers

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Employees &amp; representatives:</u> Name Address Telephone number(s) E-mail address(es) Bank account details Correspondence	Entering & managing arrangements with suppliers.	Entering into & performing contracts with suppliers.	6 years after end of membership year they cease to be a supplier

### 3.10 Staff / Instructors / Contractors / Youth Club Supervisors

Type of information	Purposes	Legal basis of processing	Retention Period
Name Address Telephone number(s) E-mail address(es) Relevant qualifications DBS certificates Correspondence	Managing employment, staff & contractors.	Performing the Club's contract with the employee / contractor.	6 years after end of membership year they cease to be employed
	Managing employment, instruction & other activities at the Club.	For the purposes of our legitimate interests in operating the Club and managing staff, instructing & other activities at the Club.	
	Communicating with employees & contractors about their work & activities at the Club.	For the purposes of our legitimate interests in operating the Club.	
	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain data required by Sports Councils.	
	Information published on the Club's website, noticeboards, Emergency Operating Procedures, Child Protection Manual, newsletters & other publications & marketing materials and made available to the RYA where appropriate as a point of contact at the Club.	For the purpose of our legitimate interests in operating & promoting the Club.	
Date of birth / age	Managing employment, staff & contractors.	Performing the Club's contract with the employee / contractor.	
Emergency contact name & telephone number(s)	Contacting next of kin in the event of emergency.	Protecting the employee / contractor's vital interests & those of their dependants.	
Health information	For risk assessments & in case of emergency.	For use with explicit consent. Protecting the employee / contractor's vital interest.	
Record & outcome of disciplinary hearings	For the enforcement of the employment contract.	Performing the Club's contract with the employee / contractor.	
Bank account details NI details	Managing employment, staff & contractors.	Performing the Club's contract with the employee / contractor.	
Photos & videos	For use in the Club's internal & external publicity & promotional materials including press, websites & other social media platforms.	For the purpose of our legitimate interests & the staff's role in promoting the Club.	12 months after cease in role
<u>Committee Attendees:</u> Meeting minutes	To maintain a record of committee discussions & decisions.	For the purpose of our legitimate interest in operating the Club.	Indefinite

#### **4. How we protect your personal data**

- 4.1 We will not transfer your personal data outside the EEA 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 required to do so by law or as set out in the tables above or paragraph 5.2 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). 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, not to use it for their own purposes and to delete it at the end of the contract. These third parties have their own Data Privacy Policies which can be found on their websites.
- 5.3 When we pass your personal data on to the RYA, as detailed in the tables above, they become a joint Data Controller of your data. Their Data Privacy Policy can be found on their website.

#### **6. How long do we keep your information?**

- 6.1 We will hold your personal data on our systems as indicated in the tables above or for as long afterwards as is necessary to comply with our legal obligations. The periods indicated are determined to be able to comply with potential future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims. On this basis, the Club is expected to keep information for:
- 3 years for personal injury claims.
  - 6 years for claims in contract, tort (excluding personal injury), tax and VAT, payroll and employment.
  - 15 years for negligence claims.

Anyone ceasing to be a member / customer can ask for their data to be removed on the condition that no claims will be made against us.

- 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 Office Administrator by contacting [office@draycotewater.co.uk](mailto:office@draycotewater.co.uk)