

# WESTBERE FROSTBITE SAILING ASSOCIATION

## DATA PRIVACY POLICY

<b>1</b>	<b>Name of the Association</b>		
	1.1	Westbere Frostbite Sailing Association is the registered name of your sailing club but in this Policy, it will be referred to as 'The Club'.	
<b>2</b>	<b>About this Policy</b>		
	2.1	This policy explains why the Club collects personal data (i.e. personal information) about its members, how it uses this information and keeps it secure, and your rights in relation to it.	
	2.2	The Club may collect, use, and store your personal data as described in this Policy providing you have given your consent.	
	2.3	The Club reserves the right to amend this Policy from time to time without prior notice. The Club will endeavour to inform you by email of any changes it makes. The Club website [ <a href="http://wfsa.info">http://wfsa.info</a> Club Rules tab] and the Club notice board display copies of this Policy. Amendments will not apply retrospectively.	
	2.4	The Club will always comply with the General Data Protection Regulations (GDPR) when dealing with your personal data. Further information about the GDPR can be found on the website for the Information Commissioner ( <a href="http://www.ico.gov.uk">www.ico.gov.uk</a> ). For the purposes of the GDPR, the Club will be the "controller" of all the personal data it holds about you.	
<b>3</b>	<b>What information the Club collects and why:</b>		
	<b>Type of data/information</b>	<b>Purposes</b>	
	<b>Legal basis of processing</b>		
	Member's name, address, telephone number(s), email address, and age category (i.e. adult or junior).	Managing the membership of the Club.	For performing the Club's contract with the member and for the purposes of its legitimate interests in operating the Club.
	The Member's name, boat class, sail number and boat description including boat name if available.	Managing race entries and race results including display on <a href="http://www.halsail.com">www.halsail.com</a> . Managing the boat compound. Monitoring the boats used by members on Westbere Lake.	For the purposes of the legitimate interests in operating the club and in particular; (i) holding races for the benefit of members of the Club, and (ii) providing boat parking for members.
	The member's name and the level of annual participation in Club activities, measured as either 12 or more participations or less than 12.	To provide a count of 'active members' in order to maintain the Club's status as a Community Amateur Sports Club and benefit from discounted business rates.	For the purposes of the legitimate interests in operating the Club for the benefit of members drawn from the community.
	The member's name and payments made to the Club.	To manage payments to the club and keep accounts.	For the purposes of the legitimate interests in operating the Club on a sound financial basis.
	The member's key loan agreement, comprising contact details, amount of deposit paid and date of agreement.	To manage the loan of access keys.	For the purposes of the legitimate interests in providing members with access to the Club site and controlling key loans.
	Club Archives Photos and videos of members and their boats. Significant race results.	When unlabelled, to display images on the Club's website to promote the Club. When labelled with the member's name and boat, to select hard copy records to contribute to the archived history of the Club.	For the purposes of the legitimate interests in promoting and archiving Club activities. The member may withdraw their consent at any time to take immediate effect but not retrospective effect, by contacting the Club by email or letter.

<b>4</b>		<b>Where is your personal data held?</b>
	4.1	Much of the personal data that you supply on the application/renewal form is held electronically on the domestic personal computers of certain officers of the Committee, normally the Commodore, the Membership Secretary, and the Secretary. In addition, the Membership Secretary holds participation information and key loan information in hard copy and the Membership Secretary and the Treasurer hold hard copy information about your payments to the Club. Race entries and results are stored in hard copy by the Commodore and electronically on the laptop of the Race Officer and on the website <a href="http://www.halsail.com">www.halsail.com</a> . [Note: Halsail publish their own privacy statement on their website; go to the Help menu and choose Terms and Conditions]. Unlabelled photos of members and their boats are stored temporarily on the camera used and subsequently on the Club's website. Any personal data stored in the Club's archives is in hard copy form in the possession of the Commodore.
<b>5</b>		<b>Who has access to your personal data?</b>
	5.1	The Club will not pass your personal data to any other members of the Club without your permission, other than those described above. Nor will it pass your personal data to any third party without your permission unless required to do so by law. The Club will not sell your personal data. Therefore, your personal data will not be accessed by anyone outside the Club, except: <ul style="list-style-type: none"> <li>(i) when the Club uploads race results to <a href="http://www.halsail.com">www.halsail.com</a>,</li> <li>(ii) when it places unlabelled images of Club activities on its website, and</li> <li>(iii) when the Club archives are on public display (see 'Club Archives' in the table above).</li> </ul>
<b>6</b>		<b>How long does the Club keep your personal data and how does it destroy it?</b>
	6.1	The Club will hold your personal data on its systems for as long as you are a member of the Club and for as long afterwards to comply with its legal obligations. It will review your personal data every year to establish whether it is still entitled to process it. If the Club decides that it is not entitled to do so, it will destroy the data. Data held electronically is destroyed by secure deletion and hard copy data is destroyed by burning or shredding. If you have expressly withdrawn your consent for the Club to hold certain data for its archives, it will comply with your request until such time as you may expressly rescind the request.
<b>7</b>		<b>Your rights under the GDPR</b>
	7.1	You have rights under the GDPR <ul style="list-style-type: none"> <li>(a) to access your personal data held by the Club and to be informed about how the Club processes your data.</li> <li>(b) to have your personal data amended or in certain circumstances erased.</li> <li>(c) to object to or restrict how your personal data is processed.</li> </ul> Please let the Club know if you are unhappy with how it has used your personal data. You also have the right to complain to the Information Commissioner' Office: <p style="margin-left: 40px;">Website: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>  Telephone: 0303 123 1113.  Information Commissioner's Office  Wycliffe House  Water Lane  Wilmslow  Cheshire SK9 5AF</p>
<b>8</b>		<b>Club Contact for personal data processing</b>
	8.1	If you have any questions, comments, requests or complaints about the way the Club processes your data, please address them to the Membership Secretary at, Geoff Connolly, Blaxland Barn, High Street, Fordwich, Canterbury, CT2 0DX, or <a href="mailto:geoffconnolly@btinternet.com">geoffconnolly@btinternet.com</a> .
		WFSA March 2018