

# Royal Highland Yacht Club



## Data Privacy Policy

### DATA PRIVACY POLICY

#### 1. About this Policy

- 1.1 The Royal Highland Yacht Club takes the security of its members' personal data seriously. We are committed to keeping members' personal data safe and will comply with the regulations when dealing with your personal data.
- 1.2 This policy explains when and why we collect personal information about our members, how we use it, how we keep it secure and your rights in relation to it.
- 1.3 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.
- 1.4 We reserve the right to amend this *Data Privacy Policy* from time to time without prior notice. We will notify you of any change to the policy and how this may affect you.
- 1.5 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.org.uk](http://www.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?

- 2.1 We are the **Royal Highland Yacht Club**. We can be contacted via the Club secretary, Ann Ashton, Acorn Cottage, Foxglove Close, Lyneal, Ellesmere, Shropshire, SY12 0FS, mobile number: 07793 581523, email: [secretary@rhyc.org.uk](mailto:secretary@rhyc.org.uk).

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

##### Data Processing

Type of information	Purposes	Legal Basis of Processing
<ul style="list-style-type: none"><li>Member's name, address, telephone number(s) and email address.</li></ul>	<ul style="list-style-type: none"><li>Managing the Member's membership of the Club and the provision of services and notification of events.</li><li>Creating and managing the Club's membership directory.</li></ul>	<ul style="list-style-type: none"><li>For the purposes of our legitimate interests in operating the Club.</li><li>Performing the Club's contract with the Member</li><li>Necessary to protect the vital interests of the data subject or of another natural person.</li></ul>
<ul style="list-style-type: none"><li>Date of birth / age related information</li></ul>	<ul style="list-style-type: none"><li>Managing membership categories which are age related i.e. Cadet membership.</li></ul>	
<ul style="list-style-type: none"><li>Bank account details of the member or other person making payment to the Club</li></ul>	<ul style="list-style-type: none"><li>Managing the Member's membership of the Club.</li></ul>	<ul style="list-style-type: none"><li>Performing the Club's contract with the Member.</li></ul>

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### Data Publication

Type of information	Purposes	Legal Basis of Processing
<ul style="list-style-type: none"><li>Member's name, address, email address, yacht name, class/rig/LOA, sail number and radio call signs.</li></ul>	<ul style="list-style-type: none"><li>Collected and shared between club members in the newsletter, Membership List booklet and/or Journal to allow members to make contact with each other.</li><li>Collected for a muster/cruise-in-company/social sailing network cruise and shared between those participating.</li></ul>	<ul style="list-style-type: none"><li>We will seek the Member's consent to publish their personal data as part of their membership application.</li><li>Member may withdraw their consent at any time by contacting the <a href="#">Secretary</a> by e-mail or letter to tell us that they no longer wish their details to appear in the Membership List booklet.</li></ul>

3.1 In addition, the Club may arrange for photographs or videos to be taken of Club activities and published on our website or social media channels to promote the Club.

### 4. How we protect your personal data

4.1 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.

4.2 The Secretary will process membership applications electronically and hold all information on a database on a dedicated laptop computer. All personal documents are held securely, i.e. electronic documents are encrypted, password protected and backed-up on a regular basis. The back-up is 'Cloud' based and held within the European Economic Area (EEA).

4.3 We have in place Policies and Procedures designed to protect the security of members' personal data.

4.4 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure (see Section 7).

### 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 table 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. for applications for blue ensign warrants, to print newsletters, Membership List booklet, Journal and/or other 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 and not to use it for their own purposes.

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### 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 is necessary to comply with our legal obligations. What information we keep is summarised in our Data Retention Schedule.
- 6.2 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.
- 6.3 We securely destroy all membership records and financial information once we have used it and no longer need it.
- 6.4 If you choose to leave the Club, we will write to you to confirm your membership records and financial information have been securely deleted.

### 7. Your Responsibility

#### Your Data

- In joining the RHYC, and consenting to the publication options of this *Data Privacy Policy*, you have a responsibility to keep members' personal information within the Club. Any members personal information shared with you via the Membership List booklet and/or other means is intended for your personal use only.
- You are responsible for ensuring that the information held about you is accurate and up-to-date. This can be done by contacting the [Secretary](#).

#### Publications

- The list of members contained in the Membership List booklet is confidential to the membership, and therefore the list should not, in whole or in part, be gifted, loaned, sold or otherwise communicated to any person or body not a member of the Club.
- All copies of the Membership List booklet must be confidentially destroyed at the end of each year or on ceasing to be a member of the Club.

#### Website

- The Club website may, from time to time, contain links to and from the websites of other selected networks, advertisers and affiliates. If a member follows a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. These policies should be checked before submitting any personal data to these websites.
- The content in the Members Only pages of our website is strictly for the personal use of members and may not be used for any other purpose or disclosed to non-members.
- Website passwords should only be saved in a browser if the device itself is password protected and has appropriate anti-virus protection to prevent online theft of these saved credentials.
- The Members Only section of the website should not be accessed on shared machines located in Internet cafés or other publicly available devices in areas where the practice

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of password theft is possible. If you have to do this, make sure you log out when you have finished, and do not save the password in the browser.

- If you have reason to believe that your own computer has been compromised (virus infected, hacked etc.) you should inform the [Secretary](#) immediately (from a separate machine).

## 8. Your rights

8.1 You have rights under the GDPR:

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

8.2 We will respond to Subject Access Requests (requests for copies of personal data from club members) within one calendar month. We will not charge for dealing with the request. We will record all correspondence of how and when we respond.

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

Website: <https://ico.org.uk/concerns/>  
Telephone: 0303 123 1113  
Address: 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 the [Secretary](#) at the address above.