

MID WARWICKSHIRE YACHT CLUB: DATA PRIVACY POLICY

1. ABOUT THIS POLICY

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.

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 website www.mwyc.co.uk or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the Data Protection Act 2018 (Act) when dealing with your personal data. Further details on the UK General Data Protection Regulations (2018) can be found at the website for the Information Commissioner (www.ico.org.uk). For the purposes of the Act, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are the Mid Warwickshire Yacht Club Ltd (The Club). We can be contacted at our registered business address or by email secretary@mwyc.co.uk

2. WHAT INFORMATION WE COLLECT AND WHY

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, email address(es).	Managing the Member's membership of the Club.	Performing the Club's contract with the Member.
	Keeping in touch with the Member (including by Loudhailer newsletter and email). Managing the roles such as security patrols, club cleaning rota and work parties.	For the purposes of our legitimate interests in operating the Club. For the purposes of our legitimate interests in operating the Club.
	For Full Club Members maintain the information for guarantors as required by law.	

Type of information	Purposes	Legal basis of processing
The Member's name, boat name associated with, boat ownership, CRT registration number, boat safety certificate, boat dimensions, boat insurance details, CRT licencing dates	Allocating moorings spaces. Managing mooring fees and subscriptions. Managing membership types. Managing security patrols, clubhouse cleaning rota. Legal obligations and requirements needed to insure and lease our premises.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
Photos and videos of Members and their boats	Putting on the Club's website, social media pages, newsletter and using in press releases.	Consent. obtained on their membership application, renewal form or separate request. The Member may withdraw their consent at any time by contacting us by email or letter.
Member's name, contact address, phone number and email address	Creating and managing the Club's Membership lists (register of Members) and to enable communication between members.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
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.
Dates individual members join, leave and change classification of membership, become Committee Members, mooring dates and periods of boats, trailers and similar craft.	To manage subscription, mooring fees and Moorings of boats and crafts. Identify seniority, available facilities and rights of both members and their boats. Maintain list of Guarantors for Full Club Members	For the purposes of our legitimate interests in operating and promoting the Club. Performing the Club's contract with the Member.

Name, email address and telephone number of each Committee member or advisor	Information published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the RYA or other affiliated organisation in each case as a point of contact at the Club.	For the purposes of our legitimate interests in operating and promoting the Club. Performing the Club's contract with the Member. Consent. This includes specific consent from directors before publishing information on any Club website.
Personal details required by law as required in order to register when becoming a Company Director	Registering details needed by company law, provision of information to banks and similar bodies.	Consent, but required if becoming a Director.
Disability	Disability Provision of adequate facilities and services for members including exemption from work parties.	Consent, but for the purposes of meeting our legal obligations (e.g. under the Equality Act 2010).
Details of work completed in support of the Club.	Support maintenance of the premises and Club	For the purposes of our legitimate interests in operating and promoting the Club.
Data pertaining to complaints, disciplinary processes, concerns and probation.	Evaluation of probation. Carrying out the disciplinary and complaints procedure.	For the purposes of our legitimate interests in operating and promoting the Club.
Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers.	Entering into and performing contracts with suppliers.

HOW WE PROTECT YOUR PERSONAL DATA

4.1 In order to manage your membership of the Club and communicate with you, it may sometimes be necessary for us to transfer your personal data outside the United Kingdom. However, we will only do so in accordance with the Act that is most likely to involve either approval that the country to which your data is being transferred provides adequate protection for personal data or on the basis of agreeing standard contractual clauses with the organisation to which we are transferring your data. Examples of this include Computer Servers holding data such as Microsoft or Google.

4.2 We have implemented generally accepted standards of technology and operational security 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.

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 we are required to do so by law, the table above or in paragraphs 5.2 and 5.3 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). 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 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 subprocessor(s) that ensure your information is kept secure and not used for their own purposes.

5.3 We may also pass aggregated data e.g. numbers of members, numbers living locally to such third parties e.g. RYA, AWCC, local council when it is in the legitimate interest of the Club to do so.

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 it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. 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.

6.2 We securely destroy all financial information once we have used it and no longer need it

6.3 We hold archival data, as exempt from the Act, for the archival data or historic activities as the club e.g. historic photographs, trophies,

YOUR RIGHTS EXPLAINED

7. It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Club Secretary at secretary@mwyc.co.uk

(a) **The right to be informed (knowing how we will use your data).**

You have the right to be told how we will use your Personal Data – which is set out in This Notice.

(b) **The right of access (being provided with copies of your data).**

You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.

(c) **The right to rectification (changing incorrect information we hold).**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.

(d) **The right to be forgotten (erasure) (requesting deletion of your Personal Data).**

In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).

(e) **The right to restrict processing (limiting how we use your data).**

In certain situations, you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.

(f) **The right to data portability (moving your data in a useable format).**

You have the right to request the Personal Data you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party - in certain situations.

(g) **The right to object (when we must stop processing your data).**

You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights, and freedoms; or the processing is for the establishment, exercise, or defence of legal claims.

(h) **The right not to be subject to automated decision-making including profiling (deciding solely by automated means without any human involvement).**

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. The Club does not undertake automated decision making or profiling.

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 further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

This policy is an adapted version based upon the template provided by the RYA.

REVISIONS:

This policy will be reviewed at least annually.

Revision History

Title	Description	Author	Date	Version
MWYC GDPR Privacy Policy	GDPR Privacy Policy (drawn from earlier policy)	Tom Willans	16/9/24	2.0