

# DATA PROTECTION POLICY

## 1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members, instructors, licensees and third parties, 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 Protection Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Protection Policy where required or appropriate without prior notice. You are advised to check our website [www.littletonsc.co.uk](http://www.littletonsc.co.uk) or our Club noticeboard regularly for any amendments (but amendments will not be applied retrospectively).
- 1.4 We will always aim to 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 Littleton Sailing Club.  
We can be contacted at Littleton Lane, Shepperton, Middx. TW17 0NF  
Email: [info@littletonsc.co.uk](mailto:info@littletonsc.co.uk), Tel: 01932 569157 (answer phone)

## 3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address, and occupation.	Managing the Member's membership of the Club.	Performing the Club's contract with the Member.
Member's occupation.	Identification of relevant skills associated with running the volunteer Club.	For the purposes of the legitimate interests in operating the volunteer-run Club.
The names and ages of the Member's dependants (if included on Member's membership).	Managing the dependants' membership of the Club.	Performing the Club's contract with the Member.
Date of birth / age related information	Managing membership categories which are age related.	Performing the Club's contract with the Member.
Member's CSSC and CSSA membership numbers (CSSC members only).	Managing the Member's membership of the Club. Verifying membership status.	Performing the Club's contract with the Member.
Member's duty type allocation and whether a clubhouse key holder.	Managing the duty roster and maintaining a list of current key holders.	For the purposes of the legitimate interests in operating the Club.
Licensee contact name, telephone number and email address.	Managing the Licensee's agreement with the Club.	Performing the Club's contract with the Licensee.

User Group contact name, telephone number and email address.	Managing the User Group's agreement with the Club.	Performing the Club's contract with the User Group.
Boat(s), boards and road trailers owned, sail nos.	Managing the Member's, Licensee's, and User Group's berthing allocation.	Performing the Club's contract with the Member, Licensee or User Group.
Gender, age.	Provision of adequate facilities for members.  Reporting information to the RYA.	Performing the Club's contract with the Member.  For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
The Member's name, boat class and sail number.  Visiting event competitors boat class (if required), sail number, age category and home club name.	Managing race entries and race results.  Posting race results on the Club's website and social media pages, printing in the Club's magazine, and sharing with other clubs, class associations, and the RYA. Providing race results to local and national media.	For the purposes of the legitimate interests in holding races for the benefit of members of the Club and visiting event competitors.  For the purposes of the legitimate interests in promoting the Club.  For the purposes of the legitimate interests of class associations in formulating series results.
Photos and videos of members and their boats	Posting on the Club's website and social media pages and using in press releases. Printing in the Club's magazine.	Consent for Member's identity to be shown with photos & videos. The Club will seek the Member's consent at least biannually. The Member may withdraw their consent at any time by contacting the Club by e-mail, or letter, or by completing a new data protection form online to tell us that they no longer wish their image to be used by the Club in this way.
The Member's name, telephone number and e-mail address	Creating and managing the Club's online and printed Membership Directory.	Consent. The Club will seek the Member's consent at least biannually. The Member may withdraw their consent at any time by contacting the Club by e-mail, or letter, or by completing a new data protection form online to tell us that they no longer wish their details to appear in the Membership Directory.

Member's bank account details.  Bank account details of third party suppliers who's invoices the Club does not pay by direct debit.	To make payment to the member on the occasion of the reimbursement of expenses. Details are only held for members making purchases on behalf of the Club.  To make payments to third party suppliers.	For the purposes of the legitimate interests of the Club in settling its debts in a timely manner.
Supplier and service contractors addresses, email addresses and telephone numbers. Individual contact names only where supplied by the party concerned.	Managing suppliers and service contracts.	For the purposes of the legitimate interest of keeping the Club operational.
Names, addresses and telephone numbers of anyone within the boundary of the Club's premises who suffers an injury which requires completion of a RIDDOR report.	Recording information relating to injury or first aid administered.	To fulfil the Club's legal obligation to comply with health and safety regulations (RIDDOR).  (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 2013)
Taster event participants names, email addresses, telephone numbers and ages.	Managing the participants taster event booking.	Performing the Club's contract with the participant.  The Club will seek the consent of the participant to contact them after the event for the legitimate interests of promoting the Club.
Taster event participant's medical conditions.	Managing attendance at the taster event.	For the protection of the participant's vital interests.
Photos and/or video during taster events.	Posting on the Club's website and social media pages and using in press releases. Printing in the Club's magazine.	Consent for participant's identity to be shown with their images: The Club will seek the participant's consent for their image to be used for the purposes of promoting the Club.
Instructor's name, email address, telephone numbers, and relevant qualifications.	Managing instruction at the club.	For the purposes of the legitimate interests of the Club in ensuring that we can contact those offering instruction for rostering, instructor communications and checking qualifications are kept up to date.
Instructor's medical conditions, GP and next of kin.	Managing instruction at the Club.	For the protection of the Instructor's vital interests in the event of illness or injury.
Course Member's name, address, email address, telephone number, age, medical information and swimming ability.	Managing instructional sailing courses held at the Club.	Performing the Club's contract with the Course Member, ensuring suitability & fitness for the course and protecting the Member's vital interests in the event of illness or injury.

Course Member's name, course date, qualification awarded.	Compiling statistics of courses and managing Member's ongoing training needs.  Reporting information to the RYA.	For the purposes of the legitimate interests of the operation of the Club's training school.  For the purposes of the legitimate interests of the RYA to maintain their records of qualifications.
Names, email addresses and telephone numbers of Members requesting to join the Improvers Group.	Managing the Improver Group.	Performing the Club's contract with the Member.
Littleton Juniors: parent Member's name, telephone number, address, sailing qualifications.	Managing Littleton Juniors.	Performing the Club's contract with the Member.
Littleton Juniors: Member's dependent's name, age, sailing qualifications, medical conditions.	Managing dependent's attendance of Littleton Juniors.	Performing the Club's contract with the Member.  Protecting the dependent's vital interests in the event of illness or injury.
Member's name and email address.	Managing the Club's social event attendances	Performing the Club's contract with the Member.

#### 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 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.3 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.4 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 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. 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 where we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.
- 5.3 We will only pass your personal data to third parties that state they are GDPR compliant. The GDPR applies to processing carried out by organisations operating within the European Economic

Area (EEA). It also applies to organisations outside the EEA that offer goods or services to individuals within the EEA.

## 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 club rules and 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 exercise or defence of legal claims.
- 6.2 We will 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 Vice Commodore ([vicecommodore@littletonsc.co.uk](mailto:vicecommodore@littletonsc.co.uk)).