



## KWSC DATA PRIVACY POLICY

Version 1.5 Last update 12 May 2018

### 1. About this Policy

1.1 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. It also covers our policy for data collection for visitors e.g. for Open event.

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 [[kwsc.org.uk](http://kwsc.org.uk)] or our Club noticeboard 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](http://www.ico.gov.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 Kielder Water Sailing Club (KWSC). We can be contacted at KWSC, Tower Knowe, Leapliph, Hexham, Northumberland, NE48 1AU and [memsec@kielderwatersc.org](mailto:memsec@kielderwatersc.org) and 01434 240052 (when the club is attended).

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

3.1 Please note that in the following table where we state data may be shared with our National Governing Body, the RYA, we will only ever share anonymised data such as the number of members, the number of members within an age range etc. We will never disclose any personal details such as name, address, email address or telephone numbers. Two exceptions are stated in the table:

3.1.1 that of RYA surveys of club members involved in RYA Accredited courses which happen from time to time.

3.1.2 Instructor personal information which is shared with the RYA e.g. for the purposes of Training Centre Inspections.

3.2 We may also share such anonymised data with third party grant funders such as Sport England or other sources of grants where such data is required as part of the grant conditions.

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Managing the duty roster.	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants.	Managing the Member's and their dependants' membership of the Club.	Performing the Club's contract with the Member.
Emergency contact details (if on an organised event or course).	Contacting next of kin in the event of emergency.	Protecting the Member's vital interests and those of their dependants.
Date of birth / age related information.	Managing membership categories which are age related.	Performing the Club's contract with the Member.
Gender.	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and 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.

Type of information	Purposes	Legal basis of processing
The Member's name, boat name and sail number.	<p>Managing race entries and race results.</p> <p>Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.</p> <p>Allocating compound spaces.</p>	<p>For the purposes of our legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>For the purposes of our legitimate interests in operating the Club.</p>
Photos and videos of members or visitors and of their boats (see more detailed advice below 3.3).	Putting on the Club's website and social media pages and using in press releases.	Consent. We will seek the Member's or Visitor's consent on their membership application form or event entry form and each membership renewal form and the Member or Visitor may withdraw their consent at any time by contacting us by e-mail or letter.
The Member's name and e-mail address.	<p>Creating and managing the Club's online Membership Directory.</p> <p>Contacting members with club news e.g. via MailChimp or similar.</p> <p>Contacting members to conduct club surveys e.g. by SurveyMonkey or similar.</p>	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.
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.

Type of information	Purposes	Legal basis of processing
Member's name and e- mail address for those attending courses.	Passing to the RYA for the RYA to conduct occasional surveys of training records for RYA Accredited courses,	For the purposes of our legitimate interests in operating the Club and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction at the club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members and the RYA.
Health records of members or their dependents attending a training or other organised course at the club including Summer Camp.	Managing course instruction at the club	The data subject (or parent) has given their explicit consent to the processing of those personal data for one or more specified purposes.
For visitors or those attending arranged coached events, the attendees name, boat name and sail number, plus any health declaration data as referenced above.	<p>Managing Open event race entries and race results.</p> <p>Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media.</p> <p>Managing arranged coaching events, whether through the club directly or via a third party, e.g. the RYA or a Class Association.</p>	<p>For the purposes of our legitimate interests in holding event for the benefit of members of the Club and the sailing community.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>For the purposes of our legitimate interests in operating the Club.</p>
Feedback forms from club organised Courses or coached events which may include the attendee's name and email details.	Managing and improving courses. Keeping records for a limited period for use as evidence during RYA Training Centre Inspections.	For the purposes of our legitimate interests in monitoring and improving our courses and for providing evidence to the RYA Inspector at annual inspections.

3.3 Data relating to images<sup>1</sup>. Guidance from the Information Commissioner suggests that in order for an image to amount to personal data, it must be possible to identify an individual from information within the image or text associated with the image e.g. names of prize winners. Being recognised by family or friends is not the same as being identified. As a result, crowd or distance shots are unlikely to amount to personal data. If it is possible to identify the individual, perhaps as a result of additional information contained in the image, the image will be considered personal data for the purposes of data protection legislation.

3.4 For the purposes of this policy images and video will include:

1. Images of individuals at a Prize Giving during an Open or Club organised event
2. Videos or images taken during a Coaching event. We expect these to be only used at the club event and not elsewhere unless explicit separate permission is sought.
3. A staged picture of an individual e.g. at a club organised event taken to use in marketing material.

3.5 It does not include images taken for RYA Course certificates which the club itself does not retain.

3.6 individual(s) themselves cannot be explicitly identified.

3.7 Through the course entry form, event entry form or other explicitly means, the club will seek consent for the use of such images as described above and where necessary seek the consent of a parent or guardian where the image involves a child. We will make it clear that such images become the ownership of Kielder Water Sailing Club but that the use of such image data may, like any other data, be withdrawn at any time. If such images were to be utilised on printed promotional material the withdrawal of such images will only be practical at the next print run of the printed material.

## 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EEA.

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.

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<sup>1</sup> Our policy is based on advice from the RYA dated 20 March 2018, <http://www.rya.org.uk/SiteCollectionDocuments/legal/Web%20Documents/Legal%20Leaflets/Clubs/Laws%20and%20Regulations/GUIDANCE%20N%20THE%20USE%20OF%20IMAGES.pdf>.

4.3 Please note however that where you information is transmitted over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we accept 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 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 we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

## 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. 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 and health information once we have used it and no longer need it.

6.3 Course declaration forms including health declaration data, and course feedback forms will be securely retained until the next annual RYA Training Centre Inspection takes place at which point they will then be destroyed. This is because they provide evidence to the Inspector of our training procedures being followed.

## 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

7.3 For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager [memsec@kielderwatersc.org](mailto:memsec@kielderwatersc.org)

## Change Log

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|------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Issue 1.1</b> | 01.02.18 | Original Document, no changes to record. RYA Guidance as basis for the document.                                                          |
| <b>Issue 1.1</b> | 12.02.18 | Minor corrections after peer review with SG, PH and JG                                                                                    |
| <b>Issue 1.3</b> | 24.03.18 | Minor updates. Inclusion of RYA advice on images. Inclusion of data protection information for visitors data. Update on retention policy. |
| <b>Issue 1.4</b> | 01.05.18 | Minor typographic and layout corrections.                                                                                                 |
| <b>Issue 1.5</b> | 12.05.18 | Approved document                                                                                                                         |