

## Llanbedr & Pensarn Yacht Club

### Data Protection Privacy Policy

The General Data Protection Regulations (GDPR) came into effect in April 2018 through the new Data Protection Act 2018. The Llanbedr & Pensarn Yacht Club (The Club) has reviewed the current procedure for data protection under a new policy.

#### 1. The Policy

- (i) The Data Protection Act 1998 has been extended with the introduction of GDPR .
  
- (ii) The Club has always complied with data protection and will comply with the new requirements under the new General Data Protection Regulations when processing your personal data.
  
- (iii) Personal data held by the Club is provided by the Member under their contract with the Club through the membership form or the renewal of membership form as appropriate. The information provided is used for the Club's legitimate interests in the operation of the Club Contract with the Member.
  
- (iv) The Membership Secretary will be the Data Controller for all personal data held and used by the Club. Any questions or comments concerning data processing in the Club should be addressed initially to the [treasurer@lpyc.org.uk](mailto:treasurer@lpyc.org.uk).
  
- (v) The Club is The Llanbedr & Pensarn Yacht Club, The Boathouse, Bar Newydd, Llandanwg, LL46 2SD.
  
- (vi) Existing Members have previously given consent to their membership record being held on a computer and will not be required to give consent retrospectively. In future membership forms and membership renewal forms will have a tick box to be completed indicating consent to data being held by the Club and used to perform the member's contract with the Club.
  
- (vii) Personal Data used under the Data Protection Privacy Policy is detailed below with an explanation as to how and when the information is used.

#### 2. How Data is used

Member's Name, Address, Telephone number, e-mail	<b>Purpose</b> – To manage the Member's Contract with the Club, including communication with the member <b>Legal Process</b> – For the legitimate processes exercised under the Club's Contract with the Member.
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Member's Name	<p><b>Purpose</b> – To draw up list of Officer's of the Day for Club events appearing in the Annual Club Programme.</p> <p><b>Legal Process</b> – For the legitimate interests in setting the Annual Programme for Club events.</p>
Member's Name, Telephone number, e-mail, Boat Name, Boat Type, Mooring number	<p><b>Purpose</b> – To form a list in the Club Handbook as a means of contacting Members in an emergency.</p> <p><b>Legal Process</b> – Confirmation of Membership to other Members and the provision of emergency contact information if required.</p>
Member's Name, Boat Name, Boat Type, Sail Number	<p><b>Purpose</b> – Managing of Club Event Entries and Results including postings on the Club website.</p> <p><b>Legal Process</b> – For the legitimate interests of running and managing the Club.</p>
Contracts with third parties providing a service to the Club.	<p><b>Purpose</b> – Manage third parties who provide a contract for service to the Club which may involve disclosure of personal data. For example a Contract with printers who produce Club Handbook.</p> <p><b>Legal Process</b> – For the legitimate interest in using third parties by means of a Contract for Service to the Club applying the most appropriate lawful approach to keep information secure and prevent them from passing on your information to any other party.</p>
Reporting	<p><b>Purpose</b> – The Club responds to information requests from RYA and provides statistical information only based on numbers. For example Number of members by gender, numbers of children by gender etc.</p> <p><b>Legal Process</b> - To assist the RYA in support it gives to Clubs</p>

### 3. Protection of Personal Data

- (i) Personal Data will be retained in generally accepted secure systems in order to protect it from loss, unauthorised alteration or misuse. The Club will inform the Member immediately of any breach of personal data being discovered so that the Member can take appropriate action and avoid exposure to risk.
- (ii) In the spirit of the new GDPR legislation the Club has made the decision to remove member's addresses from the Club Handbook for 2019 limiting the information published to names and contact numbers / e-mail only (for emergencies such as contacting a Member if there is damage to a boat or equipment). Other information covering boat name, boat type and mooring details will also be retained in the Club Handbook.
- (iii) The Club will not use your personal data outside the EEA without your prior consent.
- (iv) The Club will not sell or share a Member's personal details with a third party, except where there is a requirement in law.
- (v) Personal data will only be passed to a third party for the purpose of providing a service to the Club (such as providing a Club Handbook). Only the information required to provide the service will be supplied to the third party under its contract with the Club.
- (vi) The Club will take all reasonable steps to ensure personal data is accurate as supplied by the individual Member. Members have the rights to have inaccurate personal data corrected by requesting rectification in writing or e-mailing to the Data Controller.

#### **4. Removal of Personal Data**

- (i) Personal Data will be held in the Club systems until such time as the Member leaves the Club. Depending on when the Member leaves details may appear in the Club Handbook for more than a year after the event. However electronic information will be removed within twelve months of leaving once the Club has met any legal obligations it may have.

#### **5. Individual Rights under GDPR**

- (i) Under GDPR an individual has the following rights
  - a. The right to be informed about the collection and use of personal data
  - b. The right of access to personal data
  - c. The right to rectification if personal data is inaccurate
  - d. The right to erasure of personal data in specific circumstances
  - e. The right to restrict the processing of personal data in certain circumstances
  - f. The right to data portability ( movement of personal data to an individual or another business in certain circumstances)
  - g. The right to object to the way personal data is processed
  
- (ii) An individual has the right to make a complaint about the processing of personal data to the Information Commissioner. <https://ico.org.uk/concerns/> 03031231113

Information Commissioner's Office  
Wycliffe House,  
Water Lane  
Wilmslow,  
Cheshire SK9 5AF

If you have any queries or require more information about the Data Protection Privacy Policy, in the first instance please send an e-mail to [treasurer@lpyc.org.uk](mailto:treasurer@lpyc.org.uk).