

MSC DATA PRIVACY POLICY

1. About this Policy

1.1 This Policy explains when and why we collect personal information about our members, 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.medleysailingclub.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 General Data Protection Regulations (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found on the website for the Information Commissioner (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 Medley Sailing Club.

We can be contacted at: www.medleysailingclub.co.uk

Our postal address is: Medley Sailing Club
The Towpath
Binsey Lane
Oxford OX2 0NJ

3. 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
The names of the Member's dependants	Managing the Members' and their dependants' membership of the Club.	Performing the Club's contract with the Member.
Names, addresses, email address(es), telephone numbers, partners' and childrens' names and years of	To manage the process of applying for Club membership.	For the purposes of our legitimate interests in managing the Club.

birth (where applicable)
on Club Application Forms

Member's names and email addresses	For entry on 'Dutyman' duty roster database.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by email or by letter.
The Member's name, boat name and sail number	Managing race entries and race results.	For the purpose of our legitimate interests in holding races for the benefit of Members of the Club.
	Sharing race results with other clubs, class associations, and the RYA, and providing race results to our Newsletter, and to local and national media.	For the purposes of our legitimate interests in promoting the Club.
	Allocating compound spaces.	For the purposes of our legitimate interests in operating the Club.
Photos and videos of members and their boats.	For the Club's website, social media pages, newsletter and press releases.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by email or by letter.
Names and addresses of Visitors taking rides in Club boats on the River Thames, together with name of skipper and boat.	At the request of the Club's insurers.	For the purposes of our legitimate interests in operating the Club.
Names of Visitors, general addresses, and name of the introducing Club Member	For Club Visitors' Book	For the purposes of our legitimate interests in operating the Club
Names of visiting participants in Club Open Days and special Events	At the request of the Club's insurers.	For the purposes of our legitimate interests in operating the Club.
Names and details of contractors and suppliers to the Club.	For the purpose of managing the Club's facilities.	For the purposes of our legitimate interests in maintaining the Club's facilities for the benefit of the Members

Names of Members, email address(es), telephone numbers, boat details, membership type and when joined the Club.	Creating and managing the Club's (paper) Annual Membership List.	Consent. We will seek the Member's consent on their Membership Application Form and on each Membership Renewal Form. The Member may withdraw their consent at any time by contacting us by email or letter to tell us that they no longer wish their details to appear in the Annual Membership List.
Names and addresses of Members	Sending the Club News Letter, The Ripple.	Legitimate interest.
Members e mail addresses	Uploaded to Mailchimp to send the monthly e Ripple.	Legitimate interest.

4. MSC DATA RETENTION POLICY

DATA TYPE	TIME PERIOD RETAINED	BASIS OF RETENTION	OFFICER I/C
Membership database:	Retained during membership	Contract	Membership Secretary
Duty roster: [= 'Dutyman']	Retained during membership	Consent	Membership Secretary
Annual membership list	Retained during year	Consent	Hon. Secretary
Visitors' book	Retained	Legitimate interests	Commodore
Visitors' boat rides book	Retained at request of insurers	Legitimate interests	Hon. Treasurer
Club Newsletter [<i>The Ripple</i>] use of 'Mailchimp' programme to upload the email list for the E-Ripple	Retained during membership	Consent	Newsletter Editor
E-Mailing lists on servers	Retained during membership	Consent	

Racing entries and results	Retained during current year	Legitimate interests	Racing Secretary
Events data	Retained during current year	Legitimate interests	Racing Secretary
Boat Park list	Retained and updated	Contract	Rear-Commodore
'Moth' dinghy owners list	Retained and updated	Legitimate interests	Rear-Commodore
Contractors' data	Retained	Contract	Commodore + Rear- Commodore

'Contract' = 'Performing the Club's contract with the Member'
 'Consent' = 'We will seek the Member's consent to this'
 'Legitimate interests' = 'For the purposes of our legitimate interests in operating/promoting the Club'

5. How we protect your personal data

5.1 We will not transfer your personal data outside the EU without your consent.

5.2 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.

5.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

5.4 For any payments which we take from you online we will use a recognised online secure payment system.

5.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

6. Who else has access to the information you provide us ?

6.1 We will never sell your personal data. We will not share you 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.

6.2 We may pass on 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.

7. How long do we keep your information ?

7.1 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 so 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.

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

8. Your rights

8.1 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

8.2 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 Hon. Secretary, who acts as Data Manager:

secretary@medleysailingclub.co.uk

MSC DATA PROTECTION POLICY

We keep personal data in three forms:

- As Word or Excel files on the laptops or personal computers of the Club officers
- On the servers used by the Club
- In hard copy paper form

When data is held in electronic form, we have used generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction

When data is held in paper form, it is either stored in a locked filing cabinet at the Clubhouse, to which only the Commodore and Vice-Commodore have access, or, if kept at the home of an Officer, it is kept in a locked filing cabinet to which access is restricted

For any payments which we take from you online, we will use a recognised online secure payment system

All of the Club Officers have been trained to keep their data, whether on computers or in paper form, secure, and on no account to share any personal data with persons or institutions outside the Club; the only exception to this is the communication of racing results and boat ownership data to the RYA and dinghy Class Associations

We will not transfer your personal data outside the EU without your explicit consent.

We will notify you promptly in the event of any breach of security of your personal data which might expose you to serious risk

MSC DATA SECURITY BREACH POLICY

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to,

personal data. This includes breaches that are the result of both accidental and deliberate causes.

We are aware of what constitutes a personal data breach; the Officers of the Club are experienced in the safe keeping of the records for which they are responsible, and are apprised of the importance of continual vigilance in that regard.

The detection of personal data breaches may be the result of a notification from a member of the Club, a notification from a third party, or the discovery of a breach by an Officer of the Club. In any of these cases, our response will be to inform the Officer in charge of data security, which will be the current Hon. Secretary of the Club, without delay.

The Officer in charge of data security will make enquiries to ascertain the likely risk to individuals as a result of a breach.

We will inform affected individuals of a data breach without delay, giving them a clear description of the nature of the breach, a description of the likely consequences of a breach, and a description of the measures taken, or proposed to be taken, to deal with the breach, and including, where appropriate, a description of the measures taken to mitigate any possible adverse effects.

On becoming aware of a breach, we will try to contain it, and assess the potential adverse consequences for individuals, based on how serious or substantial they are, and how likely they are to happen.

If the breach is likely to result in a high risk to an individual's rights and freedoms, we will inform the ICO within 72 hours of the breach becoming known to us.

We will investigate whether the breach was a result of human error or systemic failure, and see how a recurrence can be prevented, whether this is through better processes, further training or other corrective steps.

Whether or not we decide to inform the ICO of any data breach, we will keep a full record of the breach and our actions in relation to it.

MSC SUBJECT ACCESS REQUEST

Under Section 7 of the Data Protection Act, individuals are entitled to see a copy of the information we hold about them.

Requests for this service [=a 'Subject Access Request'] should be addressed to the Club's Officer in charge of data security, which is the Hon. Secretary of the Club. An

informal initial enquiry may be made verbally, although for a request to be valid, it should be made in writing. Written requests may be sent in hard copy, by email or fax, or by social media.

Individuals making a Subject Access Request are entitled to be:

- told whether any personal data is being processed
- given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people
- given a copy of the information comprising the data, and given details of the source of the data.

Subject Access provides a right to see the information contained in personal data, rather than a right to see the documents that contain that information.

We will respond to a Subject Access Request as promptly as possible, and in any case within 40 calendar days of receiving it.

DATED MAY 2018