

## Paxton Lakes Sailing Club Data Privacy Policy

### 1. About this Policy

- 1.1. This policy explains when and why we collect personal information about our members, instructors and course participants, 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.paxtonlakes.org.uk](http://www.paxtonlakes.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?

We are Paxton Lakes Sailing Club and Paxton Lakes Sailing Club RTC (Recognised Training Centre)

Our location is Haul Road, Little Paxton, St. Neots, Cambridgeshire

We can be contacted by email:

[secretary@paxtonlakes.org.uk](mailto:secretary@paxtonlakes.org.uk) (for club and membership enquiries) and

[sailing.courses@paxtonlakes.org.uk](mailto:sailing.courses@paxtonlakes.org.uk) (for training enquiries)

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

Type of information	Purposes	Legal basis of processing
Name, address, telephone numbers, e-mail address(es), RYA membership number	Managing the Member’s membership of the Club. Managing the duty roster. Managing applications for courses; contact with the applicant includes but is not limited to joining instructions, cancellations and rescheduling	Performing the Club’s contract with the Member or course applicant.
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.	Contacting next of kin in the event of emergency.	Protecting the Member’s or participant’s vital interests and those of their dependants
Medical information	Ensuring the health and wellbeing of course participants	Consent. We will seek the individual or guardian’s consent on their application form and the individual may withdraw their consent at any time by contacting us by e-mail or letter.

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
Date of birth / age related information.	Managing membership categories, which are age related.  Managing pricing of courses, 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.  For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
Anonymised data	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by governing bodies
The Member's name, boat name and sail number.	Managing race entries and race results.	For the purposes 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 local and national media.	For the purposes of our legitimate interests in promoting the Club
	Allocating boat park spaces.	For the purposes of our legitimate interests in operating the Club
Photos and videos of Members or course participants and their boats	Putting on the Club's website and social media pages and using in press releases.	Consent. We will seek the individual or guardian's consent on their application form and each membership renewal form and the individual may withdraw their consent at any time by contacting us by e-mail or letter.
Bank account details of the member or other person making payment to the Club	Managing membership of the Club, the provision of services, such as courses and events.	Performing the Club's contract with the Member or applicant.

Type of information	Purposes	Legal basis of processing
Member's name and e- mail address	Passing to the RYA for the RYA to conduct surveys of Members and former members of the Club (and other clubs affiliated to the RYA). The surveys are for the benefit of the Clubs (and other clubs) and / or the benefit of the RYA.	For the purposes of our legitimate interests in operating the Club and / or the legitimate interests of the RYA in its capacity as the governing 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.	To meet our obligations under our contract with the RYA as a Recognised Training Centre.

#### 4. How we protect your personal data

We will not share your personal data outside the EU without your consent. We may use third party cloud services as a means to provide secure and robust storage of your data, which may mean that the data is physically stored outside the EU.

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.

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

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

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?

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 the paragraph below.

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.

We may also pass your personal data to the RYA for the purposes of carrying out surveys when it is in the legitimate interest of the club and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that requires the third party to keep your information secure and not to use it for their own purposes.

#### 6. How long do we keep your information?

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 Club's 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.

We 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.
- g) You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office, Wycliffe House,  
Water Lane, Wilmslow, Cheshire SK9 5AF  
Phone: 0303 123 1113.  
<https://ico.org.uk/concerns/>

For more details, please address any questions, comments and requests regarding our data processing practices to our Secretary by email at:  
[secretary@paxtonlakes.org.uk](mailto:secretary@paxtonlakes.org.uk)