



**DATA PRIVACY POLICY**

## 1 About this Policy

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- 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.
- 1.2 We may collect, use and store your personal data, as described in this Data Processing Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website [www.bmyc.uk](http://www.bmyc.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. You can find further details on the GDPR 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?

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- 2.1 We are Brighton Marina Yacht Club. We can be contacted at Western Concourse, Brighton Marina, Brighton, East Sussex BN2 5UP, email [office@bmyc.uk](mailto:office@bmyc.uk), telephone 01273 818711

## 3 What information we collect and why

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Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail addresses	Managing the Member's membership of the Club	Performing the Club's contract with the Member
	Managing the Race Officer duty roster	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	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

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
The Member's name, boat name and sail number	Managing race entries and race results. Sharing race results with other clubs, class associations, and the RYA, and providing race results to local and national media. Allocating moorings and compound spaces.	For the purposes of our legitimate interests in holding races for the benefit of members of the Club. For the purposes of our legitimate interests in promoting the Club. For the purposes of our legitimate interests in operating the Club
Photos and videos of members and their boats	Putting on the Club's website and social media pages and using in 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 e-mail or letter.
Radio call signs and/or MMSI numbers	Collected for a rally and shared between those participating in the rally.	For the purposes of our legitimate interests in managing yacht racing and ensuring that boats on a rally can maintain contact with each other
The Member's name and e-mail address	Creating and managing the Club's online Membership Directory.	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	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member.
CCTV camera footage	Recording activity in and around the clubhouse	Meeting the conditions of the Club's licence

## 4 How we protect your personal data

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- 4.1 We will not transfer your personal data outside the EEA without your consent.
- 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. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.4 For any payments that we take 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?

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- 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. [www.rya.org.uk](http://www.rya.org.uk)

## 6 How long do we keep your information?

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- 6.1 With the exception of CCTV video footage, 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.  
  
We will hold CCTV video footage for a maximum of 40 days from the data on which it was recorded unless it is requested by the Police in relation to an incident in the Clubhouse or otherwise required by the Club to support legal action.
- 6.2 We securely destroy all financial information once we have used it and no longer need it.

## 7 Your rights

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- 7.1 You have rights under the GDPR to:
  - (a) access your personal data
  - (b) be provided with information about how your personal data is processed

- (c) have your personal data corrected
- (d) 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>  
Tel: 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 [Data Protection Manager] [insert address or e-mail address].