

ROYAL NAVAL VOLUNTEER RESERVE YACHT CLUB

DATA PRIVACY POLICY

1. ABOUT THIS POLICY

- 1.1 We are the Royal Naval Volunteer Reserve Yacht Club and/or members of the Committee of the Royal Naval Volunteer Reserve Yacht Club with designated roles (“**Club**”). The Club can be contacted at dataprotection@rnvryc.org or by writing to David Monks, Data Protection Officer, RNVR Yacht Club, c/o The Naval Club, 38 Hill Street, London, W1J 5NS - NOTE written communications will take longer for responses than emails.
- 1.2 This policy explains when and why the Club collects personal data about our Members and Temporary Members, how the Club use it, how the Club keep it secure and your rights and obligations in relation to it.
- 1.2 The Club may collect, use and store your personal data, as described in this Data Privacy Policy, and as described when the Club collects data from you.
- 1.3 The Club reserves the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website (<http://www.rnvryc.org>) regularly for any amendments, which will not be made retrospectively.
- 1.4 The Club will do its utmost to 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 (<http://www.ico.gov.uk>). For the purposes of the GDPR, the Club is the “data controller” of all personal data the Club holds about you.

2. WHAT DATA THE CLUB COLLECTS AND PROCESSES AND WHY.

To meet their obligations under *Rule 24: Data and Data Protection* (Appendix), Members and Temporary Members and applicants for both types of membership supply personal data and provide their informed consent to the Club collecting and processing their personal data. They are also required to read the Club’s Data Privacy Policy in its latest version, as published on the Club’s website. They can raise any queries regarding their personal data with the Club’s Data Protection Officer at dataprotection@rnvryc.org.

Type of information:

The list below is not definitive but only illustrative of the information that the Club holds in the form of Members’ personal data:

- Member’s full name, address, telephone numbers, email addresses
- Date of birth

- Nationality
- Emergency contact Professional background
- Membership type
- Service history and status
- Sailing experience and qualifications
- Boat ownership details if applicable
- Blue Ensign permit details
- Event registration details both future and past
- Financial transactions for membership fees and invoices related to events
- Photographs of events which may contain identifiable images of a Member
- Health (as it pertains to sailing – NOT published)

More limited personal data within relevant categories listed above is held in relation to Temporary Members.

In the case of an applicant for membership or temporary membership whose application is unsuccessful, upon the rejection of the application the Club will only retain in its records the name and address of the applicant and the date of the application.

Purposes

Members' and Temporary Members' (for the purposes of this section and all following sections of this policy each person in each category being a "Member" and thereby benefiting from membership) personal data is processed for any one or more of the following purposes:

- To serve our legitimate interests in operating the Club and in promoting the Club in accordance with the Club's objectives, as set out in *Rule 2: Objects* (Appendix);
- To manage the Member's membership of the Club;
- To perform the Club's contract with the Member;
- To organise events both afloat and onshore;
- To provide goods and services, e.g. slops, training and other items which the Club may add from time to time;
- To enable Members to benefit from affiliation arrangements with other clubs;
- To serve our legitimate interests in ensuring that boats participating in an event afloat can maintain contact with each other;
- To create and manage the Club's online Membership Directory and the Club Handbook, regardless of format, thus enabling social contact between Members in fulfilment of the Club's Objects;
- To inform Members of Club news and events, both future and past, by publishing on the Club's website and/or by distributing Newsletters, News Updates and e-bulletins; and
- To enable the Club to contact a Member's designated emergency contact in the event of an emergency.

More limited processing is conducted in relation to the personal data of Temporary Members.

3. HOW THE CLUB PROTECTS YOUR PERSONAL DATA

- 3.1 The Club has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. This includes ensuring that adequate safeguards are in place for the protection of your personal data by Wild Apricot Inc., our current membership system software provider, by means of a password to gain access to the private Members' part of the website.
- 3.2 For any payments which the Club takes from you online the Club will use a recognised online secure payment system.
- 3.3 The Club will comply with the legal requirements to notify you and/or the Information Commissioner's Office promptly in the event of our becoming aware of any breach of your personal data.

4. WHO ELSE HAS ACCESS TO THE INFORMATION YOU PROVIDE US?

- 4.1 The Club will never sell your personal data.
- 4.2 The Club currently shares your personal data with the following third parties:
 - (1) The Naval Club in fulfilment of our obligation under our Affiliation Agreement with them to provide them with our membership details to enable them to determine the annual affiliation fee (which is based upon our membership total) and to enable them to give Members access under the affiliated membership arrangements;
 - (2) Volunteer Yachting Limited ("VYL"), to enable Members to charter *Volunteer* under the Club's arrangements with VYL, including at Member's rates;
 - (3) Any yacht club or other club with which the Club has reciprocal rights, to enable them to give Members access to services as determined by the specific club;
 - (4) Wild Apricot Inc., as the provider of the Club's online membership system;
 - (5) Service providers in respect of events the Club organises; and
 - (6) Various other online depositories for photographs and the Members' eHandbook.

However, the Club discloses only the personal data that is necessary for the third party to deliver the requisite service.

- 4.3 The Club may pass your personal data (on the same basis as to existing third parties) to other 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 provide online membership systems and services, to print newsletters and send you mailings and to provide meals at Club events), including to third parties who may hold and process your personal data outside the EU. You should check this policy from time to time for changes to the list of third parties at 4.2 above.

5. HOW LONG DOES THE CLUB KEEP YOUR INFORMATION?

- 5.1 The Club will hold your personal data on our systems for as long as you are a Member or Temporary Member of the Club and for as long afterwards as is necessary to comply with Rule 24 and with our legal obligations. The Club will review your personal data at appropriate intervals to establish whether the Club is still entitled to process it. If the Club decides that the Club is not entitled to do so, the Club will stop processing your personal data, except that the Club will retain your personal data in an archived form in order to be able to comply with future legal obligations, e.g. to comply with tax requirements and exemptions and in respect of legal claims.
- 5.2 The Club securely destroys all financial information relating to a Member once the Club has used it and no longer needs it where the Club is not required to keep it to meet legal and/or financial obligations.

6. YOUR RIGHTS

6.1 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) at any time (by contacting the Club by e-mail as indicated in 1.1 above), to withdraw your consent to our processing your personal data or otherwise to object to or restrict how your personal data is processed or to have your personal data erased (in certain circumstances). However, your withdrawal of such consent in its entirety and without qualification shall constitute your resignation from membership of the Club by virtue of Rule 24 (c);
- (e) at any time (by contacting the Club by e-mail at the relevant address in 1.1 above), to withdraw your consent, whether in part or in whole, for the relevant details to appear in the Membership Directory/Club Handbook;
- (f) to have your personal data transferred to yourself or to a business in certain circumstances; and
- (g) to change within your profile what information is visible to other Members in the online Membership Directory. NOTE Designated members and staff at Wild Apricot are still able to see all personal data held within the Directory whether or not you have withdrawn consent for it to be visible to other Members.

6.2 You have the right to take any complaints about how the Club processes 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 this
Data Privacy Policy to our Data Protection Officer, at dataprotection@rnvryc.org

7. YOUR OBLIGATIONS

You have the following obligations under the Club Rules and this Data Privacy Policy

- (a) to ensure that your personal data held by the Club remains current, complete and accurate at all times;
- (b) to read and abide by the Club's Data Privacy Policy in its latest version, as published on the Club's website;
- (c) unless expressly permitted by the Committee or by the Member or Members identified in the material intended for disclosure not
 - (i) to use personal data about a Member in whole or in part for disclosure to a person other than a Member;
 - (ii) not in whole or in part to download from the website the list of members, nor in whole or in part any electronic version of the list of members wherever it may be located, for mailing purposes; and
- (d) not to permit anyone to use our membership information for personal gain or for commercial or marketing purposes.

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer at dataprotection@rnvryc.org

Revised and approved by the Club's Committee on 10 December 2018

Royal Naval Volunteer Reserve Yacht Club

APPENDIX

EXTRACTS FROM THE CLUB RULES

(Adopted at the Annual General Meeting held on 10th January 2018, with Rule 24 altered by the Committee on 25 April 2018 and 10 December 2018, on each occasion pursuant to Rule 10(i))

2. Objects

The objects of the Club are:

- (a) to provide members with an annual programme of economical sailing opportunities, including cruising, racing and sail training, and social and educational events;
- (b) to maintain access to craft for the use of members;
- (c) to uphold the privileges and prestige of the Club as a Service Yacht Club by every means possible; and
- (d) to foster relations with and encourage the recruitment of new members from the Royal Naval Reserve, other Maritime Reserves and the Royal Navy (including University Royal Naval Units), the Royal Marines, the Royal Fleet Auxiliary and their Commonwealth equivalents.

24. Data and Data Protection

- (a) Each member undertakes
 - (i) to ensure that his or her personal data held by the Club remains current, complete and accurate at all times;
 - (ii) to read and abide by the Club's Data Privacy Policy in its latest version, as published on the Club's website; and
 - (iii) not in whole or in part to download from the website the list of members, nor in whole or in part any electronic version of the list of members wherever it may be located, for mailing purposes unless expressly permitted by the Committee or by the relevant member or members.
- (b) By applying for membership of the Club and, after admission to the Club, whilst remaining a member, each member consents to the Committee processing his or her personal data in accordance with the Club's latest Data Privacy Policy, as published on the Club's website, in order to serve the legitimate interests of the Club and to fulfil the Club's contractual obligations concerning the implementation, administration and management of the member's participation in the Club, including the selection and disclosure of personal data held by the Club about the member to other members of the Club for furtherance of the objects of the Club;
- (c) If a member withdraws his or her consent to the Club processing his or her personal data in its entirety and without qualification, such withdrawal of consent shall constitute the member's resignation from membership of the Club.
- (d) Upon the resignation of a member, whether by virtue of Rule 24 (c) or for any other reason, or upon the death of a member the consent which the member shall have previously given under Rule 24 (b) shall be deemed to continue

- (i) to enable the Club to continue to process the member's personal data based on its legitimate interests and in fulfilment of its contractual obligations; and
- (ii) to enable the Club to maintain its archives;