

ROYAL NAVAL VOLUNTEER RESERVE YACHT CLUB

DATA PRIVACY POLICY

1. ABOUT THIS POLICY

- 1.1 We are Royal Naval Volunteer Reserve Yacht Club (“**the Club**”) and/or members of the Committee of the Club with designated roles. We can be contacted at honsec@rnvryc.org. or on 07802 490631.
- 1.2 This policy explains when and why we collect personal data about our Members and Temporary Members, how we use it, 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 (<http://www.rnvryc.org>) regularly for any amendments, which will not be made retrospectively.
- 1.4 We will do our 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, we will be the “controller” of all personal data we hold about you.

2. WHAT INFORMATION WE COLLECT AND PROCESS 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 us 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 our processing their personal data with the Club’s Data Protection Officer (contact details below).

Type of information:

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

- Membership ID, Full name, Address, Telephone Numbers, Email Addresses
- Date of birth
- Nationality
- Emergency contact
- Personal background (profile), Job title, present and past clubs and organisations
- Membership list

- Rank or rate (List 1 only)
- Service (List 1 only)
- Year left service or Active status (List 1 only)
- Year joined Club
- Details of any vessel owned
- Sailing experience and qualifications
- Details of any Blue Ensign warrant permits held
- Health (as it pertains to sailing – NOT published)
- Events attended or intended to attend
- Financial transactions (NOT published)
- Photographs, for Club publicity to members

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 we will only retain in our 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 we 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 Newsletters, News Updates and e-bulletins; and
- To enable us 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 WE PROTECT YOUR PERSONAL DATA

- 3.1 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. 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. However, no security arrangements can be guaranteed to be 100% secure. Please note that this is also the case when you transmit information to us electronically.
- 3.2 For any payments which we take from you online we will use a recognised online secure payment system.
- 3.3 We will notify you and the Information Commissioner's Office promptly in the event of our becoming aware of any breach of your personal data which might expose you to serious risk of identity theft.

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

- 4.1 We will never sell your personal data.
- 4.2 We currently share 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 we organise;

However, we disclose only the personal data that is necessary for the third party to deliver the requisite service and we require them to keep your information secure and not to use it for their own purposes.

- 4.3 We 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 will be informed by e-

Bulletin, in advance wherever practicable, when we add such third parties to the list at 4.2 above.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

- 5.1 We 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. 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. to comply with tax requirements and exemptions and in respect of legal claims.
- 5.2 We securely destroy all financial information once we have used it and no longer need it.

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 us by e-mail or letter at the relevant address 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 us by e-mail or letter 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; and
 - (f) to have your personal data transferred to yourself or to a business in certain circumstances;
- 6.2 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, David Monks (david.c.monks@gmail.com, tel: 07932 674894).

Approved by the Club's Committee on 25 April 2018

Tim Ware

Hon. Secretary

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 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 is responsible
 - (i) to ensure that his or her personal data held by the Club remains current, complete and accurate at all times; and
 - (ii) to read the Club's Data Privacy Policy in its latest version, as published on the Club's website.
- (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;