



Earlswood Lakes Sailing Club

Privacy Policy

General

1.1 Earlswood Lakes Sailing Club (“we”, “us” or “ELSC”) take the privacy of your information very seriously. Our Privacy Notice is designed to tell you about our practices regarding the collection, use and disclosure of personal information which may be provided to us through our websites or collected through other means such as in person by us, by an online form, email, or telephone communication.

1.2 This notice applies to personal information provided by our members and their authorised users and affiliated individuals. In this notice “you” refers to any individual whose personal data we hold or process (i.e: to you as an individual member, or potential member, or to you as an individual affiliated with one of our members, or potential members).

1.3 In general, our services are limited to the information required to run ELSC and we do not process personal data on a large scale, but we will hold certain data in relation to individual members, or potential members and individuals affiliated with our members (for events in our social calendar for example where members may bring guests, and this notice sets out the basis on which we hold that data.

1.4 This notice is governed by the EU General Data Protection Regulation (the “GDPR”) from 25 May 2018.

2. Legal Basis on which we process personal data

2.1 Personal data we hold about you will be processed either because:

2.1.1 the processing is necessary in order for us to comply with our obligations under a contract between you and us, specifically for the provision of our membership services;

2.1.2 the processing is necessary in pursuit of a "legitimate interest", a legitimate interest in this context means a valid interest we have or a third party has in processing your personal data which is not overridden by your interests in data privacy and security.

2.1.3 The third party we use is Webcollect to process and administer payments and membership subscriptions. They have their own privacy policy <https://webcollect.org.uk/help-topic/privacy-notice>

3. Personal data we collect

3.1 We may collect and process the following personal data (information that can be uniquely identified with you) about you:

3.1.1 for individuals associated with our members we may hold contact information such as names, email addresses, phone numbers, and addresses ("Member Contact Information");

3.1.2 for individuals associated with our suppliers and other third parties we interact with we may hold contact information such as names, email addresses, phone numbers, addresses, and job titles and/or specific roles within your organisation ("Third Party Contact Information");

3.1.3 a record of any correspondence or communication between you and us and any information we may require from you when you contact us or make an enquiry ("Communication Information");

3.1.4 marketing information we may hold about you in order to provide information about our Sailing Club this may include names, email addresses, phone numbers, addresses, ("Marketing Information").

3.2 We will collect information either from you directly or from a third party (for instance your employer or an introducer (JLR scheme etc)). If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.

3.3 You do not have to supply any personal information to us in practice we may be unable to provide our services to you without personal data (for instance we will need contact information in order to communicate with you). You may withdraw our authority to process your personal data (or request that we restrict our processing) at any time but there are circumstances in which we may need to continue to process personal data (please see below).

4. How we process your personal data

4.1 Please see the table below, which sets out the manner in which we will process the different types of personal data we hold:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
When we are setting up an account with a member or potential member with whom you are associated or entering into an agreement to provide services to our member.	Member Contact Information Communication Information	Performance of a contract with you Necessary for our legitimate interests (to establish necessary information about you in order to provide our services)
When we communicate with you as an individual affiliated with our, members, or potential members in order to provide our services to you.	Member Contact Information Communication Information	Performance of a contract with you Necessary for our legitimate interests (in order to deliver our services).
When we enter into an agreement with you or an organisation with which you are connected as a supplier.	Third Party Contact Information Communication Information.	Performance of a contract with you Necessary for our legitimate interests (in order to deliver our services).
When we communicate with you as an individual affiliated with our supplier or another third party we interact with.	Third Party Contact Information Communication Information	Performance of a contract with you Necessary for our legitimate interests (in order to deliver our services).
When we communicate with you, or you as an individual affiliated with our members, or potential members, about our services (for instance if you request services).	Member Contact Information Communication Information	Performance of a contract with you Necessary for our legitimate interests (for running our business and to provide you with our Service)
To manage our relationship with you.	Member Contact Information Communication Information	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests

To administer and protect our business, including maintenance, support, reporting and hosting of data	Member Contact Information Third Party Contact Information Communication Information	Necessary for our legitimate interests (for running our club, provision of administration services, network security) Necessary to comply with a legal obligation
To store your contact information for marketing purposes and sending marketing and other promotional communications to you.	Member Contact Information Marketing Information	Necessary for our legitimate interests in promoting our services to members.

For each type of data listed above, definitions are included under clause 3.1.

5. Data Retention

5.1 Our current data retention policy is to delete or destroy (to the extent we are able to) the personal data we hold about you in accordance with the following:

Category of personal data	Length of retention
Records relevant for tax authorities (CASC Regs)	8 years from the end of the year to which the records relate
Personal data processed in relation to a membership contract between you and us	3 years from either the end of the contract or the date you last used our membership,
Personal data held on file	3 years from the last date on which a data subject has interacted with us

5.2 For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 3 years from the date of receipt by us of that data.

5.3 The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

5.4 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.

5.5 If you wish to request that data we hold about you is amended or deleted, please refer to clause 8 below, which explains your privacy rights.

6. Sharing your information

6.1 We do not disclose any information you provide to any third parties other than as follows:

6.1.1 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);

6.1.2 in order to enforce any rules or agreements for our memberships that may apply;

6.1.3 to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties.

6.2 Other than as set out above, we shall not disclose any of your personal information unless you give us permission to do so.

7. Security

7.1 We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):

7.1.1 protecting our servers with software firewalls in the case of private computers used to run the club;

7.1.2 locating our data processing storage facilities in secure locations (see webcollect);

7.1.3 when necessary, disposing of or deleting your data so it is done so securely;

7.1.5 backing up and encrypting all data we hold.

7.2 We will ensure that our data processors are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of

their privacy and data security obligations. (Webcollect)

7.3 This notice and our procedures for handling personal data will be reviewed as necessary.

7.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use the strict procedures and security features referred to in this clause to try to prevent unauthorised access.

8. Your privacy rights

8.1 The GDPR gives you the following rights in respect of personal data we hold about you:

The right to be informed	You have a right to know about our personal data protection and data processing activities, details of which are contained in this notice.
The right of access	You can make what is known as a Subject Access Request ("SAR") to request information about the personal data we hold about you (free of charge, save for reasonable expenses for repeat requests). If you wish to make a SAR please contact us as described below.
The right to correction	Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within one month. We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.
The right to erasure (the 'right to be forgotten')	Please notify us if you no longer wish us to hold personal data about you (although in practice it is not possible to provide our services without holding your personal data and we may need to keep your data in some circumstances). Unless we have reasonable grounds to refuse the erasure, on receipt of such a request we will securely delete the personal data in question within one month. The data may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible. We will communicate the erasure to any third parties to whom we have passed the same information.

The right to restrict processing	You can request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data. However again, some of our Services will not be available if processing is restricted.
The right to data portability	You have right to receive copies of personal data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your personal data directly to third party (where technically possible).
The right to object	Unless we have overriding legitimate grounds for such processing, you may object to us using your personal data for direct marketing purposes or for research or statistical purposes. Please notify your objection to us and we will gladly cease such processing. (we don't do this anyway but it's a standard clause)
Rights with respect to automated decision-making and profiling	You have a right not to be subject to automated decision-making (including profiling) when those decisions have a legal (or similarly significant effect) on you. You are not entitled to this right when the automated processing is necessary for us to perform our obligations under a membership contract with you, it is permitted by law, or if you have given your explicit consent.
Right to withdraw consent	If we are relying on your consent as the basis on which we are processing your personal data, you have the right to withdraw your consent at any time. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).

8.2 All SARs and other requests or notifications in respect of your above rights must be sent to us in writing to The Data Protection Officer, Earlswood Lakes Sailing Club, Malthouse Lane, Earlswood. B94 5RY

8.3 We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

9. Data Breaches

9.1 If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO) and/or our data protection manager.

9.2 If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

10. Other websites

10.1 Our Service may contain links and references to other websites. Please be aware that this notice does not apply to those websites.

10.2 We cannot be responsible for the privacy policies and practices of sites that are not operated by us, even if you access them via the Site, our Portal, or any other service that is operated by us. We recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

10.3 In addition, if you came to this Service via a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

11. Transferring your information outside Europe

11.1 We will not transfer your data outside the EU.

12. Notification of changes to the contents of this notice

We will post details of any changes to our policy on [our website] to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

13. Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so via the following address: The Data Protection Officer, Earlswood Lakes Sailing Club, Malthouse Lane, Earlswood. B94 5RY

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk/> for further assistance.