

	Helensburgh Sailing Club		
	STANDARD OPERATING PROCEDURE		
HSC Privacy Policy			
Policy No	05 – Rev07	Prepared By	Donald McLaren
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1. What we need

- 1.1. Helensburgh Sailing Club (“HSC”) provides services for members including training, yacht and dinghy racing, dinghy parking and moorings area access along with occasional catering and bar facilities for members and their guests. The club is affiliated to the Royal Yachting Association and the Clyde Yacht Clubs’ Association. HSC is a “Community Amateur Sports Club” and is registered as such in accordance with the relevant prescriptions set out by HMRC.
- 1.2. HSC will be a “controller” of the personal information that you provide us via your application for membership, your annual subscription renewal, and any additional club services such as moorings, racing, training, etc in which you choose to participate.
- 1.3. When you register as a member of HSC or renew your membership (including if you are registering on behalf of a child under the age of 18), we will ask you for the following personal information:
 - name, address, email address, date of birth, and class of membership;
 - information on how you expect to participate (e.g. day sailing, cruising, racing, training, volunteering);
 - details of your boat(s), if any, and storage/moorings requirements;
 - optionally, gender information for use in summarised-only reporting to sportscotland

2. Why we need your personal information – contractual purposes

Members’ personal data:

- 2.1. We need to collect our members’ personal information so that we can manage your membership. We will use our members’ personal information to:
 - enable us to set up your membership records for the purposes of gathering subscriptions;
 - assign moorings and dinghy parking facilities where required;
 - send you membership communications by post or email in relation to essential membership services including, but not limited to, general meeting notices, membership renewals, and information about upcoming club events and activities;
 - manage your participation in optional activities such as racing and training.
- 2.2. If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

Participants’ personal data:

- 2.3. When you book a place with us for, and attend, a training course or an open racing event, we need to collect your personal information so that we can honour your booking and to enable you to participate.
- 2.4. If you do not provide us with all of the personal information that we need to collect then this may affect our ability to book your place.

3. Why we need your personal information – legitimate purposes

Members' personal data:

- 3.1. We also process our members' personal information in pursuit of our legitimate interests to:
 - promote and encourage participation in the sport of sailing by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed, and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
 - provide competition in the sport of sailing by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
 - monitor and develop participation in the sport of sailing by monitoring members' engagement and participation, and inviting our members to participate in surveys for researching and development purposes;
 - invite our members as prize-winners or guests to the relevant prize-givings. This may include asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email;
 - develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements;
 - respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the sport of Sailing. This could include procedures initiated via the Protests Procedure as set out in the Racing Rules of Sailing and the Code of Conduct set out by the RYA. And seek support from members for self-help activities within the club – e.g. maintenance, duty rosters, etc.
- 3.2. Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us via the office: 01436 673424 or office@helensburghsailingclub.co.uk . If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

Volunteers' personal data:

- 3.3. We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.
- 3.4. If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.
- 3.5. Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on via the office. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

4. Why we need your personal information – legal obligations

- 4.1. We are under a legal obligation to process certain personal information relating to our members, for the purposes of complying with our obligations under:
 - the legislation found in the Corporation Tax Act (CTA) 2010 Part 13 Chapter 9 and Community Amateur Sports Clubs Regulations 2015.
 - the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults;
 - our **sportscotland** obligations to provide annual summarised returns on participation
 - the Licensing Act in respect of compliance in the sale of alcohol.

5. Other uses of your personal information

- 5.1. We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

6. Who we share your personal information with

- 6.1. If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with sponsors or accredited journalists for promotional and/or journalistic purposes.

- 6.2. We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children. We may also share personal information with our professional and legal advisors for the purposes of taking advice.
- 6.3. HSC employs a third party supplier to provide payroll services. This supplier may process personal information on our behalf as “processor” and is subject to written contractual conditions to only process that personal information under our instructions and to protect it.
- 6.4. In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Royal Yachting Association - members’ personal data

- 6.5. HSC may occasionally participate in nationally-run surveys operated by the RYA. These are conducted via email and we will share your email details with the RYA who will become a controller of your personal information when they receive it. Their Data Privacy Notice can be accessed at <http://www.rya.org.uk/legal-info/Pages/privacy-security-and-data-protection.aspx>
- 6.6. For members with moorings, details are shared with the administrators of Crown Estate Scotland for the purposes of moorings licensing. These administrators (currently Bidwells in Perth) become the controller of the subset of personal data when they receive it.

Participants’ personal data

- 6.7. We publish the results of our competitions on our website and via the press for major events. This includes competitors’ names and results.

7. How we protect your personal information

- 7.1. Your personal information is stored on our password-protected electronic filing system utilising a secure laptop computer kept in lockfast storage within our controlled-access clubhouse office. This is accessed by our committee and administrator(s) for the purposes set out above. Subsets of the information may be stored in DropBox secure servers and shared between committee members ONLY for the purpose of effective communications with the relevant members. Control of this data sharing is managed by the Club Secretary.
- 7.2. We utilise MailChimp for members’ newsletters and we upload email addresses to MailChimp for this purpose.

- 7.3. Both MailChimp and DropBox have servers based in the US but they have signed up to the "Privacy Shield", which is an agreement between the US and EU Commission relating to the protection of personal data – this constitutes a "safeguard" under the GDPR. The agreements relating to MailChimp were last revised in May 2019 by incorporating the Data Processing Agreement into the standard Terms of Use to which HSC (like other MailChimp users) signs up when electing to use the service.
- 7.4. We utilise BookWhen to manage temporary membership and associated bookings for "Pay As You Go" sailing. BookWhen uses servers monitored by Google Cloud Platform and is fully compliant with European Economic Area (EEA) GDPR requirements. Data sent outside EEA (e.g. for back-up) is subject to "Privacy Shield" standards, as noted above.

8. How long we keep your personal information

Members' personal data

- 8.1. We will only keep your personal information for as long as necessary to provide you with membership services. We will delete your personal information where you have not renewed your membership with us by the published deadline for the current season. MailChimp is kept in synch with our membership records.

Participants' personal data

- 8.2. We keep results of events for up to five years.

9. Your rights

- 9.1. You can exercise any of the following rights by writing to us at HSC Clubhouse, Rhu Road Lower, Helensburgh, G84 8QT or by email to office@helensburghsailingclub.co.uk .
- 9.2. Your rights in relation to your personal information are:
 - you have a right to request access to the personal information that we hold about you by making a "subject access request";
 - if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
 - you have a right to request that we restrict the processing of your personal information for specific purposes;
 - if you wish us to delete your personal information, you may request that we do so.

- 9.3. Any requests received by HSC will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk
- 9.4. HSC is registered with the Information Commissioner’s Office, primarily in recognition of the use by the club of CCTV in maintaining surveillance of the Dinghy Park for security purposes.

10. Consent

- 10.1. HSC relies on email for communications with members. When you join, and supply us with an email address, we will respond with a Welcome email confirming the details you have supplied. For existing members, the annual (hard copy) Subscription Request provides the opportunity to keep these details correct.
- 10.2. The Membership Application form and the annual Subscription Renewal request both invite you to confirm your consent to communications by email. If you wish, you may also “unsubscribe” to communications from MailChimp and we will then, additionally, delete your email address from our records and advise you that we have done this.