

Data Privacy Policy

1. About this Policy

- 1.1. This policy explains when and why we collect personal information about our members, instructors, customers, visitors and race entrants; 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 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 <https://rtyc.org/privacy> or our Club noticeboard regularly for any amendments. Amendments will not be made retrospectively.
- 1.4. We will always comply with General Data Protection Regulation (GDPR) when we are dealing with your personal data. Further details on GDPR can be found at the website of the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all the personal data we hold about you.

2. Who are we?

- 2.1. We are Royal Torbay Yacht Club and Torbay Youth Sailing Trust. We can be contacted at:

Post

Royal Torbay Yacht Club
12 Beacon Terrace
Torquay
Devon
TQ1 2BH

Email

admin@rtyc.org

Telephone

01803 292006

Web

<https://rtyc.org>

Post

Torbay Youth Sailing Trust
12 Beacon Terrace
Torquay
Devon
TQ1 2BH

Email

tyst@rtyc.org

Telephone

01803 292006

Web

<https://tyst.org.uk>

3. What information we collect and why.

This section describes the types of information we collect, why we collect it and under what legal basis we will process your information. The section is split into three sections, Members & Instructors, Customers and Race Entrants.

Members, Instructors and Employees		
Type of Information	Purpose of collection	Legal basis for processing
Member’s name, address, telephone numbers, email address(es), relevant qualifications.	Managing the Member’s membership of the Club.	Performing the Club’s contract with the Member.
	Managing roster of Club volunteers.	

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	<p>Coronavirus contact tracing (Name, telephone number and/or email address, time of arrival and approximate time of departure). Data captured for Coronavirus contact tracing purposes will be destroyed within 28 days.</p>	<p>For the purposes of our legitimate interests in operating the Club.</p> <p>Legal Requirements – to comply with legal requirements under the Coronavirus Regulations and for Coronavirus contact tracing we may pass your Name, telephone number and/or email address, date and time of visit to the NHS Test and Trace service or other appropriate governmental body.</p>
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.
Member's emergency contact details	Contacting next of kin in the event of an emergency.	Protecting the Member's vital interests and those of their dependants.
Age related information	Managing membership categories which are age related.	Performing the Club's contact with the Member.
Gender	<p>Provision of adequate facilities for members.</p> <p>Reporting information to the Royal Yachting Association (RYA)</p>	<p>For the purposes of our legitimate interests in operating the Club - in order to provide sufficient gender specific facilities.</p> <p>For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.</p>
The Member's boat name, sail number, mooring location and handicapping data	<p>Managing race entries and race results.</p> <p>Sharing race results with other Clubs, Class Associations, the RYA and providing race results to local and national media.</p> <p>Allocating moorings or storage compound spaces where applicable.</p>	<p>For the purposes of our legitimate interests in holding races for the benefits of Club Members.</p> <p>For the purposes of our legitimate interests in operating the Club.</p> <p>For the purposes of our legitimate interests in operating the Club.</p>
Photographs and videos of members and their boats	Putting on the Club's website, social media pages, display within the Clubhouse, Club newsletters (printed or	Consent. We will seek the Member's consent either on their membership application form when joining or via other

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	electronic), printed promotional materials and press releases.	appropriate means. The member may withdraw their consent at any time by contacting us via email or letter. Consent may not be withdrawn verbally.
Radio call signs	Collected for cruises or races and shared between those participating in the cruise or race.	For the purposes of our legitimate interests in ensuring that boats on a cruise or race can main contact with one another, and that event organiser can maintain contact with event participants.
Member's email address	To provide regular Club Newsletters containing details of activities and events directly related to the Club.	For the purposes of our legitimate interests in operating the Club. You can remove yourself from our mailing list at any time by clicking the "update your preferences" link that can be found at the base of any newsletter email.
Bank account details of Members or other persons making payment to the Club.	Managing the Member's and their dependant's membership of the Club, the provision of services and events.	Performing the Club's contract with the Member.
Member's name and email address.	Passing to the RYA for the RYA to conduct surveys of members of the Club (and members of other clubs affiliated to the RYA). The surveys are for the benefit of the Clubs and/or the RYA.	For the purposes of our legitimate interests in operating the Club and/or the legitimate interest of the RYA in its capacity as the national body for all forms of boating.
Instructor's name, address, email address, phone numbers and relevant qualifications and/or experience.	Managing training and instruction at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.
Employee's name, address, email address, phone numbers.	To administer the employee's employment contract with the Club.	Performing the Club's contract with the employee.
Employee's emergency contact details.	Contacting next of kin in the event of an emergency.	Protecting the Employee's vital interests and those of their dependants.
Closed Circuit Television Footage	For crime prevention and compliance with licensing requirements made of the Club by Torbay Council. Coronavirus contact tracing – to enable approximate times of	For the purposes of our legitimate interests in operating the Club and necessary for compliance with a legal obligation.

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	arrival and departure. CCTV retention times are extended to 28 days on entrance and exit cameras.	
Customers		
Type of Information	Purpose of collection	Legal basis for processing
Customer's name, address, telephone number and email address	To enable us to effectively administer the service we have undertaken to provide you with. Coronavirus contact tracing (Name, telephone number and/or email address, time of arrival and approximate time of departure). Data captured for Coronavirus contact tracing purposes will be destroyed within 28 days.	Performing the Club's contract with the customer. To contact the customer for future marketing of products and services we will seek consent. Legal Requirements – for Coronavirus contact tracing we may pass your Name, telephone number and/or email address to the NHS Track and Trace service.
Customer's relevant medical information where required.	This sensitive personal information will only be collected in situations where it may be necessary (e.g. on a training course involving on the water activities). The information will be securely destroyed when no longer required (for example following completion of the training course)	Protecting the Customer's vital interests in the event of an emergency.
Customers financial information.	Financial information will only be collected to process a payment for a service provided. The information required to process the payment will be destroyed when no longer required. Supplementary information (e.g. till receipts) will be securely retained until no longer required for accounting purposes.	Performing the Club's contract with the customer.
Visitors and Guests of Members		
Type of Information	Purpose of collection	Legal basis for processing
Name of Visitor or Guest of Member	To enable us to monitor visitors to the Club as required by Club Rules and our Premises Licence.	For the purpose of the legitimate interests in operating the Club.

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<p>Name, Telephone number and/or email address, date of visit and approximate times of arrival and departure.</p>	<p>Coronavirus contact tracing (Name, telephone number and/or email address, time of arrival and approximate time of departure). Data captured for Coronavirus contact tracing purposes will be destroyed within 28 days.</p>	<p>Legal Requirements – to comply with legal requirements under the Coronavirus Regulations and for Coronavirus contact tracing we may pass your Name, telephone number and/or email address, date and time of visit to the NHS Test and Trace service or other appropriate governmental body.</p>
Race entrants and their crew members		
Type of Information	Purpose of collection	Legal basis for processing
<p>Entrants' name, address, email address, telephone number, boat name, sail number, handicapping information.</p>	<p>To enable us to effectively administer the running of the race event.</p> <p>Coronavirus contact tracing (Name, telephone number and/or email address, time of arrival and approximate time of departure). Data captured for Coronavirus contact tracing</p>	<p>Performing the Club's contract with the race entrant.</p> <p>Entrants' names, boat name, sail number and handicapping information may be publicly published on an entry list as is usual practice for sporting events.</p> <p>Consent. We will seek your consent to use these details for future promotional activities.</p> <p>Legal Requirements – to comply with legal requirements under the Coronavirus Regulations and for Coronavirus contact tracing we may pass your Name, telephone number and/or email address, date and time of visit to the NHS Test and Trace service or other appropriate governmental body.</p>
<p>Crew members' name, email address and telephone number.</p>	<p>To enable us to effectively administer the running of the race event.</p> <p>Coronavirus contact tracing (Name, telephone number and/or email address only). Data captured for Coronavirus contact tracing purposes will be destroyed within 28 days.</p>	<p>Performing the Club's contract with the race entrant.</p> <p>Crew members' names may be publicly published as is usual practice for sporting events.</p> <p>Consent. We will seek your consent to use these details for future promotional activities.</p> <p>Legal Requirements – for Coronavirus contact tracing we</p>

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		may pass your Name, telephone number and/or email address to the NHS Track and Trace service.
Entrants and crew member's relevant body measurements (incl. height and weight)	To enable us to effectively administer the running of the race event within the rules of the sport.	Performing the Club's contract with the race entrant. For the purposes of our legitimate interests in operating the Club and in the legitimate interests of sports governing bodies and class associations.
Race entrants' and crew members' date(s) of birth (where under 18)	To enable us to ensure effective safeguarding procedures are in place.	Protecting the race entrants' and crew members' vital interests.
Relevant medical information.	To enable us to ensure effective safety procedures in the event of an emergency.	Protecting the race entrants', crew members' and their dependant's vital interests. This sensitive personal information will be destroyed or redacted beyond legibility once no longer required.
Race entrants' and crew members' emergency contact details.	To allow us to contact next of kin in the event of an emergency	Protecting the race entrants', crew members' and their dependant's vital interests. This information will be destroyed or redacted beyond legibility once no longer required.
Race entrants' financial information	To enable us to process race entry fees to ensure the effective administration of the race event.	Performing the Club's contract with the race entrant.
Radio call signs	Collected for to allow communication between race entrants and race officials.	For the legitimate interests of the Club to ensure the effective management of race events. To protect the vital interests of race entrants in the event of an emergency.
Photographs and videos of entrants' and crew members' and their boats.	For promotional use to either provide coverage of the event (possibly live), or for promotion of future events or the Royal Torbay Yacht Club itself.	Consent. We will seek your consent at race entry. You may withdraw your consent at any time in writing. Consent may not be withdrawn verbally.

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4. How we protect your personal data

- 4.1. We will not transfer your personal data outside the EU without your consent.
- 4.2. We have implemented generally accepted standards of technological and operational security in order to protect data from loss, misuse or unauthorised alteration or destruction.
- 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 we take from you we will always use a recognised 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?

- 5.1. We will never sell your personal data. We will never share your personal data with third parties without your prior consent (which you are free to withhold) except where required to do so by law or as described in 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 produce mailings). However, we will disclose only the personal data that necessary for the third party to deliver the service and we have a contract in place which requires them to keep your information secure and not to use it for their own purposes.
- 5.3. We may pass your personal data to government bodies or agencies if required to do so by statute or regulation. If required to do so, we will provide only the minimum data required to dispense with our legal obligations.

6. How long do we keep your information?

- 6.1. 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 for us to comply with our legal obligations. We will review your personal data each 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 the establishment of the defence of legal claims).
- 6.2. We securely destroy all financial information once we have used it and are no longer required to retain it.

7. Your rights

- 7.1. You have rights under the GDPR:
 - 7.1.1. to access your personal data
 - 7.1.2. to be provided with information about how your personal data is processed
 - 7.1.3. to have your personal data corrected
 - 7.1.4. to have your personal data erased in certain circumstances
 - 7.1.5. to object to or restrict how your personal data is processed
 - 7.1.6. to have your personal data transferred to yourself or to another business in certain circumstances.

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7.2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Web

<https://ico.org.uk/concerns/>

Telephone

0303 123 1113

Post

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 Club Manager via email at manager@rtyc.org.

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Version History

Version	Date	Modifications
0.1	03/03/18	Initial version
0.2	12/04/18	Addition of relevant qualifications to Section 3 “Member’s name, address, telephone numbers, email address(es)” to allow for re-assurance of appropriate qualifications for volunteers involved in safety critical processes.
0.3	03/05/18	Addition of race entrants and crew members to section 3. Addition of Torbay Youth Sailing Trust to policy. Minor layout and formatting changes. Change of wording of section 6.2.
1.0	24/05/18	Initial published version. Addition of Visitors and Member’s Guests to section 3.
1.01	23/10/18	Updated Torbay Youth Sailing Trust website address.
1.02	25/06/20	Updated to reflect requirements for co-operation with the NHS Track & Trace service during the Coronavirus pandemic.
1.03	22/09/20	Clarified wording relating to Coronavirus and NHS Test & Trace, added CCTV wording relating to the same.