



NEPTUNE SAILING - DATA PRIVACY POLICY

1 About this Policy

- 1.1 This policy explains when and why we collect personal information about our members and instructors, 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.
- 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 (www.pbsc.eu) or our Charity noticeboard regularly for any amendments.
- 1.4 We will 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 (www.ico.gov.uk). For the purposes of the GDPR, we are the 'controller' of the personal data we hold about you.

2 Who are we?

- 2.1 We are Neptune Sailing. We can be contacted at: Cat House Lane, Woolverstone, Ipswich IP9 1AU via www.neptunesailing.org; or **07707 056158**

3 What information we collect and why

<i>Type of information</i>	<i>Purposes</i>	<i>Legal basis of processing</i>
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Charity. Managing the duty roster.	Performing the Charity's contract with the Member. For the purposes of our legitimate interests in operating the Charity.
The names and ages of the Member's dependants.	Managing the Member's and their dependants' membership of the Charity.	Performing the Charity's contract with the Member.
Emergency contact details.	Contacting next of kin in the event of emergency.	Protecting the Member's vital interests and those of their dependants.
Date of birth / age related information.	Managing membership and/or event categories which are age related.	Performing the Charity's contract with the Member.



Type of information	Purposes	Legal basis of processing
Gender	<p>Provision of adequate facilities for members.</p> <p>Reporting information to the RYA.</p>	<p>For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.</p> <p>For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.</p>
Photos and videos of members and helpers engaged in sailing or watersports	Putting on the website and social media pages by committee members; using in press releases.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by e-mail or letter.
The Member's name and e-mail address while a current member and for up to a year after ceasing to be a member of the Charity.	To enable us to maintain contact with the member	For the purposes of our legitimate interests in operating the Charity and/or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction at the Charity.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.

Type of information	Purposes	Legal basis of processing
Name and email address of each Charity officer.	Information published on the Charity's website, in Charity newsletters and other publications, in Charity marketing materials and made available to the RYA, in each case as a point of contact at the Charity.	For the purposes of our legitimate interests in operating and promoting the Charity.
Name and email address of each Charity committee member.	Information published on Charity's website and in Charity newsletters.	For the purposes of our legitimate interests in operating and promoting the Charity.
Employees and representatives of suppliers to the Charity.	Entering into and managing arrangements with suppliers.	Entering into and performing contracts with suppliers.

Neptune Sailing is a company limited by guarantee incorporated in England

Registered address : Neptune Centre, Cat House Lane, Woolverstone, Ipswich, IP9 1AU

Ver: 1/19



Registered Charity : 1148791

Company number : 8012364

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 use generally accepted standards of technology and operational security in order to protect personal 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 which we take from you online we will use a recognised online 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 not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 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 manage duty allocation, print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Charity and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.
- 5.3 We may also pass your personal data to the RYA for the purposes of carrying out surveys when it is in the legitimate interest of the Charity and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.



Neptune Sailing

Sail and Powerboat Training



Registered Charity : 1148791

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How long do we keep your information?

We will hold your personal data on our systems for as long as you are a member of the Charity and for as long afterwards as it is in the Charities' legitimate interest to do so or for as long as is necessary to comply 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. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

Your rights

You have rights under the GDPR:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances.

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

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

0303 123 1113

Information Commissioner's Office Wycliffe House

Water Lane Wilmslow Cheshire SK9 5AF

Please address questions, comments and requests regarding our data processing practices to one of our elected Charity officers via www.pbsc.eu/about-us/contact-us.

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