



# HURST CASTLE SAILING CLUB 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 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 ([hcsc.org.uk](http://hcsc.org.uk)) or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always 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](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. Who are we?

- 2.1 We are Hurst Castle Sailing Club. We can be contacted by post at Hurst Castle Sailing Club, Keyhaven, Lymington, Hampshire SO41 0TP. We can also be contacted by email: [secretary@hcsc.org.uk](mailto:secretary@hcsc.org.uk)

## 3. What information we collect and why

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Managing the duty roster. Managing the Dinghy Park Keeping in touch with the Member (including by Newsletter)	Performing the Club's function in accordance with its rules. For the purposes of our legitimate interests in operating the Club. For the purposes of our legitimate interests in operating the Club. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Club	Performing the Club's function in accordance with its rules.

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 categories which are age related	Performing the Club's function in accordance with its rules.

The Member's name, boat name, boat type and sail number	<p>Managing race entries and race results.</p> <p>Publishing race results at the Club and with other clubs, class associations, and the RYA, and providing race results to local and national media.</p> <p>Allocating dinghy park and rack spaces.</p>	<p>For the purposes of our legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>For the purposes of our legitimate interests in operating the Club</p>
Photos and videos of Members and their boats	Putting on the Club's website, social media pages, newsletter and using in press releases.	Consent. We will seek the Member's consent on their membership application form and the Member may withdraw their consent at any time by contacting us by e-mail or letter.
Radio call signs	Collected for a rally and shared between those participating in a rally.	For the purposes of our legitimate interests in ensuring that boats on a rally can maintain contact with each other.
The Member's name and e-mail address	For the purposes of contacting the member about club business.	Consent. We will seek the Member's consent on their membership application form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish us to store their details electronically.
Bank account details of the Member or contractor doing work for the Club	<p>Making payments to Members or contractors for the provision of services, goods and equipment.</p> <p>Managing the Member's and their dependants' membership of the Club, and the provision of services and events.</p>	<p>Performing the Club's function in accordance with its rules.</p> <p>Performing the Club's function in accordance with its rules.</p>
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience	Managing 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.

Name, email address and telephone number of each Club Officer	Information published on the Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the RYA, in each case as a point of contact at the Club.	For the purposes of our legitimate interests in operating and promoting the Club.
Name, email address and telephone number of each Club committee member	Information published on Club website and/or in Club programme	For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers

#### 4. **How we protect your personal data**

- 4.1 We will not transfer your personal data outside the UK without your consent.
- 4.2 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.
- 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 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 required to do so by law or as set out in the table above.

#### 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 to comply with our legal obligations. We will periodically review your personal data 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.

- 6.2 We securely destroy all financial information once we have used it and no longer need it.

#### 7. **Your rights**

- 7.1 It is important that you understand what rights you have in respect of the Personal Data that we hold

about you.

a) ***The right to know how we will use your data***

You have the right to be told how we will use your Personal Data – this is set out in this Policy.

b) ***The right to be provided with copies of your data***

You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.

c) ***The right to be have incorrect information changed***

If you believe our records are inaccurate you have the right to ask for those concerning yourself to be updated.

d) ***The right to ask for your Personal Data to be deleted***

In some cases, you have the right to have your Personal Data deleted from our database.

e) ***The right to limit how we use your data***

In certain situations, you have the right to ask for processing of your Personal data to be restricted because of a disagreement about its accuracy or legitimate usage.

f) ***The right to move your data in a useable format***

In certain situations you have the right to request the Personal Data that you provided to us, in a structured, commonly used, and machine readable format and/or transmit that data to a third party.

g) ***The right to object***

You have the right to object to us processing data purely for our legitimate interest. If you make such a request, we must stop processing your Personal Data unless; we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is to for the establishment, exercise, or defence of legal claims.

h) ***The right not to be subject to automated decision-making including profiling***

Hurst Castle Sailing Club does not undertake automated decision making or profiling

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

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

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 Vice Commodore [vicecommodore@hcsc.org.uk](mailto:vicecommodore@hcsc.org.uk)

This Data Privacy Policy has been produced using guidelines provide by the RYA (Royal Yachting Association) to which HCSC is affiliated. Information on the RYA is available at: [rya.org.uk](http://rya.org.uk)

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January 2024

Next review due by January 2029