



CAM SAILING CLUB DATA PRIVACY POLICY

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Table of Contents

1.	About This Policy	3
2.	Who Are We?	3
3.	What Information We Collect and Why	3
4.	How We Protect Your Personal Data	6
5.	Who Else Has Access to the Information You Provide Us?	7
6.	How Long Do We Keep Your Information?	8
7.	Your Rights Explained	8
	Addendum - COVID-19 Pandemic Response	11
1.	General Information	11
2.	Data That We Will Collect	11
3.	How the Data Will be Collected	12
4	Use and Transfer of Data	12
5	Consent	14
6	Data Retention	15



1. About This Policy

- 1.1 This policy explains when and why we collect personal information about our members, instructors and visitors, 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 www.camsailingclub.org.uk/ regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always comply with the UK General Data Protection Regulation (**UK GDPR**) when dealing with your personal data. Further details on the UK GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the UK GDPR, we will be the “controller” of all personal data we hold about you.

2. Who Are We?

- 2.1 We are Cam Sailing Club. We can be contacted at Clayhithe Road, Waterbeach, CB25 9HZ or via secretary@camsailingclub.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. Keeping in touch with the Member (including by newsletter). Managing the duty roster.	Performing the Club's contract with the Member. 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 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 categories which are age related	Performing the Club's contract with the Member.
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>
The Member's name, boat name 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 moorings and compound spaces.</p> <p>Administration of annual membership fees</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> <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.	Members may withdraw their consent at any time by contacting us by e-mail or letter.
Bank account details of the member or other person the club makes payments to.	Managing payments for services and club expenses	For the purposes of our legitimate interests in operating the Club
The Member's name and e-mail address, whilst a current member of the Club	Passing to the RYA for the RYA to conduct surveys of Members of the Club. See paragraph 5.3 below.	For the purposes of our legitimate interests in operating the Club 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 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, e-mail address and telephone number of each Club Officer	Information published on 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, e-mail address and telephone number of each Club committee member	Information published on Club's website	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
Name, address, contact email & telephone number, medical conditions, previous boating experience, swimming ability and details of an emergency contact (inc telephone number) for visitors to the Club.	For administration of visitors on the Club grounds	<p>For the purpose of our legitimate interest to monitor non-members visiting the club grounds.</p> <p>For the purpose of our legitimate interest to ensure the health and safety of non-members visiting the club grounds and taking part in activities we offer</p> <p>For the performance of our contract(s) with insurers</p>

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 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, 5.3 and 5.4 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 send you mailings). We do this for the purpose of our legitimate interests in operating the Club 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 club 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.
- 5.4 We have agreed a block licence agreement with the Cam Conservators to cover all sailing dinghies without auxiliary engines. To comply with this agreement, you will be required to display a licence number (provided to you by the club) on both sides of your hull. In the event of an incident on the water we will be required to pass your name and contact details over to the Cam Conservators. Your data will only be passed over if requested in writing by them, detailing the nature of the incident and their justification for requiring your details. You will be informed in writing by the Secretary if your details have been passed over to the Cam Conservators.



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 it is in the Clubs' 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.
- 6.2 We will hold all data collected on visitors for only as long as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review all data collected on visitors regularly (and at least annually) 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.
- 6.3 We securely destroy all financial information once we have used it and no longer need it.

7. Your Rights Explained

- 7.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined below please email secretary@camsailingclub.org.uk or write to FOA: Hon Secretary, Cam Sailing Club, Clayhithe Road, Waterbeach, CB25 9HZ
- (a) **The right to be informed (knowing how we will use your data).**
You have the right to be told how we will use your Personal Data – which is set out in This Notice.
- (b) **The right of access (being 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 rectification (changing incorrect information we hold).**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.

(d) **The right to be forgotten (erasure) (requesting deletion of your Personal Data).**

In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).

(e) **The right to restrict processing (limiting how we use your data).**

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

(f) **The right to data portability (moving your data in a useable format).**

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

(g) **The right to object (when we must stop processing your data).**

You have the right to object to us processing data purely for our legitimate interests. 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 for the establishment, exercise or defence of legal claims.

(h) **The right not to be subject to automated decision-making including profiling (making a decision solely by automated means without any human involvement).**

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. Cam 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

- 7.3 For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.



Addendum - COVID-19 Pandemic Response

1. General Information

- 1.1 This addendum to the privacy policy explains to members the additional data that will be collected and how that data will be handled during the COVID-19 pandemic.
- 1.2 It will be in force for the duration of the pandemic and until such time as it is no longer necessary to collect this further data.
- 1.3 It does not replace any part of this privacy policy and all data will be processed in accordance with the clauses set out above.
- 1.4 If a conflict arises between this addendum and the privacy policy set out above, this addendum will take precedent only for the data that is collected for the specific purpose of responding to the COVID-19 pandemic.

2. Data That We Will Collect

- 2.1 Members who have been diagnosed with COVID-19 or have been in close contact with someone who has been diagnosed with COVID-19 and has been onto the club grounds 14 days prior to, or after the diagnoses are requested to advise the Club Secretary the dates and times they attended the club.
- 2.2 During the COVID-19 pandemic the Cam Sailing Club is required to keep records of all members who attend the club grounds in order to assist NHS Track and Trace.
 - 2.2.1 The additional data that will be collected will include (but may not be limited to);

Members name (or name of lead member in a group)
Number of members in group
Contact telephone number / additional contact details
Data and time of arrival onto club grounds
Date and time of leaving the club grounds



3. How the Data Will be Collected

- 3.1 Diagnosis of, or close contact with someone who has COVID-19
 - 3.1.1 Members who have been diagnosed, or been in close contact with someone who has been diagnosed, with COVID-19 are requested to advise the Secretary by emailing secretary@camsailingclub.org.uk
- 3.2 NHS Track and Trace QR Code
 - 3.2.1 An NHS Track and Trace QR code will be displayed at entry points to the club and on the outside of the clubhouse.
 - 3.2.2 Members who have downloaded the NHS Track and Trace app will be able to scan this QR code using their smartphone.
- 3.3 Text Message
 - 3.3.1 Members who do not have a smart phone, or do not wish to scan the NHS Track and Trace QR code are requested to send a text message to XXX with the following information;
 - Name
 - Number in group (if not attending alone)
 - Time of arrival
 - Expected time of departure

4 Use and Transfer of Data

- 4.1 Diagnosis of, or close contact with someone who has COVID-19
 - 4.1.1 Information provided about a COVID-19 diagnosis, or close contact with someone diagnosed with COVID-19 will be kept in the strictest confidence and the identity of the member will only be shared with committee members who have a legitimate interest in forming an official response.



- 4.1.2 This information may be used to inform the membership they may have been exposed to the virus, but the identity of the member who has been diagnosed, or has had closed contact with someone who has been diagnosed, will not be disclosed, unless the member has given prior written consent.
- 4.1.3 This information may be used by the committee to ensure the health, safety and wellbeing of all club members, whilst ensuring the identity of the member is kept confidential.
- 4.1.4 This information will not be processed in any other way or passed on to any other third parties.

4.2 NHS Track and Trace QR Code

- 4.2.1 Attendance on the club grounds will be recorded directly on the NHS Track and Trace app and will not be stored by or accessible to Cam Sailing Club.
- 4.2.2 Members using the NHS Track and Trace QR code will be subject to the NHS privacy policy, which will be viewable via the app.

4.3 Text Message

- 4.3.1 Details collected via text message will be transferred to NHS Track and Trace only if requested by them.
- 4.3.2 Only the details of those members who were at the club during the time frame requested by NHS Track and Trace and who have consented to this processing (see clause 5 below) will be transferred.
- 4.3.3 Once data has been transferred to NHS Track and Trace it will be subject to their privacy policy, which can be found here <https://contact-tracing.phe.gov.uk/help/privacy-notice>
- 4.3.4 Data collected for NHS Track and Trace will not be transferred to any other third party or processed in any other way.



5 Consent

5.1 Diagnosis of, or close contact with someone who has COVID-19

- 5.1.1 By providing the requested information, members consent to their data being used as set out in clause 4.1 above.
- 5.1.2 The identity of the member who has been diagnosed, or been in close contact with someone diagnosed with COVID-19 will be kept strictly confidential and only revealed to those outside the committee with prior written consent from the individual.
- 5.1.3 The member who has been diagnosed, or been in close contact with someone diagnosed with COVID-19 may withdraw their consent to being identified at any time by informing the Club Secretary.
- 5.1.4 The member who has been diagnosed, or been in close contact with someone diagnosed with COVID-19 is unable to withdraw their consent to any other processing (as set out in clause 4.1 above) as it is processed under the legitimate interest of ensuring the health, safety and wellbeing of all club members.

5.2 NHS Track and Trace QR Code

- 5.2.1 Members using the NHS Track and Trace QR code will be subject to the NHS privacy & consent policy, which will be viewable via the app.

5.3 Text Message

- 5.3.1 Members are under no obligation to provide the information requested in this addendum for NHS Track and Trace.
- 5.3.2 By providing data via text message, members are consenting to the club passing this information to NHS Track and Trace if we are requested to do so.



- 5.3.3 Members further consent to be contacted by NHS Track and Trace should they deem the member has sufficient risk of being exposed to COVID-19.
- 5.3.4 A member may withdraw their consent to the processing of their data provided by text message at any time by informing the Club Secretary by emailing secretary@camsailingclub.org.uk
- 5.3.5 If consent is withdrawn all details held be deleted and no details will be passed to NHS Track and Trace.

6 Data Retention

- 6.1 Diagnosis of, or close contact with someone who has COVID-19
 - 6.1.1 Data held on a member's diagnosis, or close contact with someone who has been diagnosed with COVID-19 will be stored securely for as long as it is in the club's legitimate interest to ensure the health, safety and wellbeing of all club members.
- 6.2 NHS Track and Trace QR Code
 - 6.2.1 The Cam Sailing Club does not store or have access to any data provided via the NHS Track and Trace QR code.
 - 6.2.2 Data provided in this way will be subject to the NHS Track and Trace retention schedule. Their privacy policy can be found via the app.
- 6.3 Text Message
 - 6.3.1 The data provide to the club via text message for NHS Track and Trace will be held for 21 days + 1 week (max. 28 days).
 - 6.3.2 All data will be securely deleted in the + 1 week.
 - 6.3.3 The retention period is subject to change if the requirement stipulated for record keeping by the government is updated.