



DATA PROTECTION POLICY

25 May 2018

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members and staff, 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 Protection Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Protection Policy from time to time and without prior notice. You are advised to check our website www.clyc.co.uk 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 can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the controller of all personal data we hold about you.
- 1.5 To accompany this Policy, a Data Privacy Notice is available to all members to expand on the new rules governing personal data.

2. Who Are We?

- 2.1 We are the City Livery Yacht Club (CLYC). We can be contacted at clubsec@clyc.co.uk

3. What Information we collect and why?

Type of Information	Purposes	Legal Basis for Protection
Member's name, address, telephone and e-mail address(es)	Managing the Member's membership of the Club To inform Members of Club events and activities	Performing the Club's contract with the Member. For the purposes of our legitimate interests in operating the Club and keeping Members informed.
Member's name and boat name	Allocating berthing and race / cruise participation	For the purpose of our legitimate interests in operating the Club.

Type of Information	Purposes	Legal Basis for Protection
Photos and videos of Members and their boats.	Placing on the Club's website and social media pages.	We will seek a Member's consent to use this material. The member may withdraw their consent at any time by contacting us by e-mail or letter.
The Member's name, e-mail address, name of boat and brief details of sailing experience. Any additional information provided may only be input by the Member.	Creating and managing the Club's online Membership Directory. The Member is solely responsible for the additional information provided in the Membership Directory including their personal photograph.	We will seek the Member's consent via email or letter or seek consent on their membership application for new members. The Member may withdraw their consent at any time by contacting us by email or letter to tell us that they no longer wish their details to appear in a Membership Directory.
Bank account details of the Member	Managing the Member's membership subscription of the Club.	Performing the Club's contract with the Member.
Staff personal details: name, address, telephone number, e-mail address(es), date of birth, National Insurance Number, and Bank account details.	Manage the staff member and provide details to payroll to ensure prompt payment of wages.	For the purposes of our legitimate interests in managing the staff member and performing the Club's contract with the member of Staff.

4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the EEA 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 to do so by law or as set out in the table above or 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. 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.

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 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 established 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 You have rights under the GDPR:
- (a) to access your personal data;
 - (b) to be provided with information about how your personal data is processed;
 - (c) to have your personal data corrected;
 - (d) to have your personal data erased in certain circumstances;
 - (e) to object or to restrict how your personal data is processed;
 - (f) to have your personal data transferred to yourself or to another business, in certain circumstances.
- 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 or requests regarding our data Protection practices to our Club Secretary via e-mail clubsec@clyc.co.uk or in writing to the Club Secretary, 79 Palace Gardens Terrace, LONDON W8 4EE