



DATA PRIVACY NOTICE

25 May 2018

1. CLYC Policy and Summary

CLYC has a Data Protection Policy that has been agreed by the Committee. This can be read by clicking on this link <http://www.clyc.co.uk/about-us/> or asking in the Secretary for a copy. This document is a product of that policy. The EU General Data Protection Regulation (GDPR) and PECR are the main stem of Data Protection provisions within UK and this Club will comply with all relevant legislation. In view of GDPR it has been agreed by the Committee that the following practices will be adopted:

For Members of the Club a listing of members will be maintained with e-mail contact details; this will enable all Club notices to be promulgated including maritime Safety Notices and, also, Health and Safety notices as well as general Club notices about all functions. This will be done under the auspices of **Legitimate Interest**.

For employees of the Club as well as contractors; the auspices of **contract** from each contracted person/entity will be used for holding their data. The members of CLYC who assume a position of responsibility, such as a place on the Committee, will as part of their role, have their contact details recorded and kept by the Secretary under the auspices of **Legitimate Interest**. The minimum of personal details will be disseminated to members and displayed in accordance with performance of the role's responsibilities.

It may be necessary to pass personal data to third parties in the course of the running of the Club such as using a web builder, IT support or using a mailing service or hospitality caterer. Where this is necessary the third parties will be required to treat the data in accordance with relevant legislation and be subject to Non-disclosure provisions. They will be required to treat the data securely and only for the purpose specified by the Club.

CLYC is the data controller and the person responsible in CLYC for the use and security of the data is the Club Secretary. All personal data will be kept in the Secretary's Office in a secure fashion. The data will only be used for the purposes it was collected. The Secretary and person to which data issues may be addressed is:

Club Secretary, 020 7993 2849 clubsec@clyc.co.uk

Personal data – what is it?

Personal data relates to a living individual who can be identified from data. Identification can be by the information alone or in conjunction with any other information in the Data Controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR") and any subsequent legislation.

3. Who are we?

We are the City Livery Yacht Club (CLYC). The Secretary of the Club is responsible for the use and security of your data. This means CLYC and its Secretary decides how your personal data is processed and for what purposes.

4. How do we process your personal data?

CLYC complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To administer CLYC including all associated sailing and maintenance functions;
- To administer CLYC formal and social occasions;
- To maintain our own accounts and records;
- To collect the annual membership subscription;
- To promote CLYC as an established organization in the City of London and promote events and sponsorship that the Committee believe worthwhile from time to time;

5. What is the legal basis for processing your personal data?

- Processing is necessary, using **Legitimate Interest** for carrying out obligations under financial, employment, social security or social protection law, or a collective agreement;
- Processing, where contracts are the essential element;
- Processing for special category data such as health, religious beliefs, trade union membership etc. are carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with personnel and other organisations associated with CLYC in order to provide Club facilities/events/services. We will only share your data with third parties for the running of the Club subject to relevant legal provisions incumbent on all.

7. How long do we keep your personal data?

We keep data in accordance with the ICO guidance. Normally, it is kept for the period of time that you are a member of the Club. Applications for membership that are unsuccessful will be kept for 12 months in case of challenge. Contractors and employees' data will be reduced to a minimum on completion of the contract and only kept a record of employment/service for reference purposes. Financial records and associated personal data will be kept for the year of the transaction and six full tax years following.

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which CLYC holds about you;
- The right to request that CLYC corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for CLYC to retain;
- The right to withdraw your consent (if under the consent permission) to the processing at any time;
- The right to request that the Data Controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) *[Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the Data Controller processes the data by automated means]*;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) *[Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]*
- The right to lodge a complaint with the Information Commissioners Office.

9. Further processing

If CLYC wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

10. Your part in Data Protection

It would be very useful if you could make a point of keeping the Club informed of any changes to the information we hold about you. This will be helpful to you and the Club for efficient administration but also it is essential for security as well as H&S provisions.

11. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the CLYC Secretary on 020 7993 2849 or at clubsec@clyc.co.uk

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.