

# **Privacy Policy**

Eastleigh and District Model Boat Club

June 2018

The Eastleigh & District Model Boat Club holds certain personal information, or data, on its members. The aim of this policy document is to ensure that the processing of this data is compliant with current EU and UK legislation, which came in to force on the 25 May 2018.

The new laws deal with PERSONAL DATA, which is any information that relates to an identified or identifiable natural person.

Some data may also be referred to as SENSITIVE PERSONAL DATA. However, no SENSITIVE PERSONAL DATA is to be held or processed by the Club. Sensitive data would include ethnic, medical, legal, criminal or workplace information, as just some examples.

## **How does this new policy affect the individual member?**

As the Club is compliant with current data protection regulations, for the individual member, this means that:

- There is no compulsion on you to give this information
- You may view, withdraw or amend this information at any time
- This data will be held by appropriate Club and Divisional Officers, in support of your safety and the smooth running of the Club. It will normally be held in password protected electronic format
- This data will only knowingly be released to any other body or organisation, with your consent e.g. The MYA).
- Your email address may appear in group email lists, and therefore be visible to other Club members. You should inform the Club secretary and your Divisional Secretary if you wish your email address to be kept private from other members.
- Your photo and name may appear, from time to time, in Club websites and in Club emails. This will be solely in relation to Club activities, and no other. You may opt out of this if you wish. The actual taking of photographs is covered by separate law, though your wishes will be respected within the context of the Club.

## **Personal Data**

The information needs of the Club are limited and very simple, as compared to the organisations for which the 2018 regulations, GDPR, are mainly designed. These items of data are either essential or helpful, to the smooth running of the Club. The Club believes that Club Officers and Members have a LEGITIMATE INTEREST in the Club's Officers continuing to hold member data, or, indeed, in the open sharing of some information among members.

The following rules are applied to members' personal data:

Personal data requested of a member may include, but not exceed the following:

- Given name.
  - Surname
  - Postal address, inc Post code
  - Home telephone number
  - Mobile telephone number
  - Preferred telephone number to call in emergency
  - Email address
  - MYA Membership no ( Sail Division if relevant)
  - Yacht designs and Sail Numbers (Sail Division )
  - Photographs (from time to time)
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- ALL data is given voluntarily. There is no compulsion.
  - Data may be withdrawn at any time, immediately, and requiring no reason from the Club member.

- Members may view their own data held, at any time, given reasonable notice, and have the right to correct this information at any time. In fact members are encouraged to update information as it changes.
- In providing their personal data, members are also giving consent for that data to be held and used in the manner described in this document.
- On resigning from the Club, a member may ask for their data to be deleted immediately. Without this direction, Club Officers may retain the data for no longer than 3 months.
- These items of data are held by appropriate Club Officers and Divisional Committee members. This means that only those Club officers and Divisional Officers who require access to this data, to fulfill their functions, actually hold this data.
- Personal Data may be held by a Club or Divisional Officer in the following forms, but only for as long as it is required:
  - On a laptop, tablet or smartphone, with basic password protection.
  - Email addresses will be held by Club Officers in either a ‘cloud’ or proprietary email system, with sound password protection.
  - Private members may hold the email addresses of other members, by virtue of receiving and forwarding Group emails. This is personal data, so should be password protected, to respect the privacy of other members. These emails and addresses should only be used for Club recreational activity, and every effort should be made not to perpetuate scams or other forms of malign use, viruses etc. Members are advised to consider using special email addresses specifically for Club use, leaving their domestic email addresses for separate private use.

- Paper copies of personal data should only be printed, when absolutely essential, for specific and time-limited requirements. Hard copies are to be destroyed when no longer required. These temporary hard copies are to be given effective security.
- Where any member withholds data, as is their right, they accept that this may lead to a reduction in their level of communication within the Club. For example, email is the key form of communication within the Club, so that withholding an email address, or being unable to access email, will render the member unable to receive much of the information being passed around the Club, unless alternative arrangements can be made.
- The Club has two Data Control Officers, one for each Club location, Highbridge and Lakeside. The DCOs are chosen by each Divisional Committee, to oversee their particular areas. The two DCOs have responsibility for ensuring that information is controlled within Club policy and the law, and that the information held is kept to a minimum. The two Club locations may have slightly differing needs in the way that some information is handled, but there should still be full compliance with this overall policy, and indeed EU and UK policy. The DCOs report to the Divisional Committees and then the Club Committee, thus ensuring even and full compliance across the Club.

## **Emails**

The main form of communication within the Club, is by email. Group emails may be sent to members in ‘Blind’ or ‘Open’ distribution’ forms, subject to the consent of individual members, but also subject to the originator’s assessment of risk from malign intervention, which may vary from time to time.

## **Scale and Sail Websites and Blogs**

The Club also has two websites and Blogs, which involve limited release of personal information, such as names, photographs, and means for contacting some Club officers.

For these websites and blogs to provide the best service to members, blanket permission is sought to use names and photographs taken during Club activities. Explicit parental permission is required before a photograph of an identifiable minor is used on a Club website or Blog. Although the law does allow photos to be taken of minors, in the context of the Club parental consent should always be sought before any photographs are taken of identifiable minors.