



Privacy & Data Protection Policy

Wembley Sailing Club is committed to protecting and respecting your privacy. We need to process certain personal data to manage your membership, deliver training courses and issue and manage certificates and qualifications. If you have any questions, concerns or comments please email training@wembleysailingclub.co.uk

This policy explains when and why we collect personal information about you, how we use it, how we keep it secure and the circumstances when it may be disclosed to others. The policy also explains your rights in relation to personal information.

We keep this policy under regular review, it was last updated on 9th April 2019.

Who are we?

1. We are Wembley Sailing Club, Birchen Grove, London, NW9 8SA (we, us).

When do we collect your personal information?

2. We manage and deliver different things so collect personal information at different times. These include when you:

a. Join, or apply to join, Wembley Sailing Club;

- i. you become a member of the club
- ii. you join the club's committee or volunteer for the club in any other capacity
- iii. you join or participate in, or any child for whom you are responsible joins or participates as a member of any of our training and development programmes or club racing
- iv. you become an instructor or other appointment holder at the club
- v. you join us a member of staff or agree to become a contractor for us

b. Use a Wembley Sailing Club product or service;

- i. the club website: www.wembleysailingclub.co.uk
- ii. the club booking system when booking a training course with us
- iii. subscribe for email newsletters and updates
- iv. enter a competition, promotion or survey run by us
- v. obtain any training or coaching directly from us
- vi. undertake any assessment or examination provided by us
- vii. undertake an RYA qualification which is centrally registered by the RYA

What type of information do we collect?

3. Common information we ask for includes:

- a. Your name, address, e-mail address and phone number in order to contact you.
- b. Financial and credit card information, in order that we can process an order for you
- c. Photographs for instance in connection with photo verified certificates (such as the ICC) and for marketing purposes
- d. For those participating in events, training programmes, or teams;
 - i. Details of any relevant medical conditions which could affect your participation (which will only be collected when you have provided your express consent)
 - ii. the name, address, email address and phone number of your next of kin and/or emergency contact
 - iii. details of any relevant training records and training plans
 - iv. details of your participation and performance in sporting events and competitions
 - v. any relevant dietary records and details of your dietary requirements
- e. for those applying to join the club as a member of staff, committee member, volunteer, contractor or in some other capacity
 - i. details of your current occupation and employment history
 - ii. details of any relevant boating, yachting or other sea faring experience you may have
 - iii. health information including any particular health conditions or mental or physical impairments you may have which may impact on your role, and details of your qualifications including the results of any examination or assessment
- f. Additional Information we collect about you when you visit our website or use one of our online systems;
 - i. technical information, including the Internet protocol (IP) address used to connect your computer or mobile device to the internet, your browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
 - ii. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; items purchased and the cost of those items including any discounts; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number
- g. Information which may be provided on your behalf or at your request, for example if:
 - i. any person makes a booking for any of our training courses, facilities or other services on your behalf;
 - ii. you are a minor and your parent or legal guardian provides us with information about you on your behalf; or
 - iii. we take up references for you or seek verification of any of your qualifications from any referee you may have put forward.

- h. The information about you which we may receive from other sources may include the results of any criminal records searches (for those employed or volunteering for the club).

Why do we collect this information?

- 4. When we collect information from you directly we explain the reason for collecting that information at the time of collection. We may collect this information in order to:
 - a. Fulfil a contract with you;
 - i. to administer your membership and to provide membership information and membership benefits to you, to notify you about changes to our membership benefits, products, facilities or services
 - ii. to provide you with any products and services that you request from us including: items purchased from us, event entries, training participation, equipment loans, coaching and training services and examination and assessment services
 - iii. to register you as a qualification or credential holder
 - iv. to keep you up to date with certain information when this is required because you hold a particular qualification
 - v. to consider an application to join the club as an employee, volunteer, committee member or in some other capacity, and to manage any such relationship
 - b. When it is in our legitimate interests, and our interests are not overridden by your own interests;
 - i. to ask questions for the purposes of market research
 - ii. to provide you, with information about goods or services we feel may interest you that are similar to those that you have already obtained, purchased or enquired about. If you are an existing member or customer, we will only contact you by electronic means (e-mail or text message) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you
 - iii. to consider any complaints made to us about you
 - c. When we have obtained your consent to do so;
 - i. when you have opted in to receive email newsletters and other marketing materials
 - d. When we have obtained your explicit consent to do so;
 - i. when dealing with 'special categories' of information such as medical data, biometric or profiling data, passport data or similar as defined by the General Data Protection Regulation, for instance medical information gathered to participate in an event, or to hold a particular qualification or licence.

When do we share your information?

- 5. We may share your information with certain third parties including:
 - a. The RYA - On successful completion of an RYA Powerboat course your name, contact details, date of birth, certificate number and date of issue will be shared with the RYA through a secure web portal on www.rya.org.uk. The data will be stored on the RYA's

central database. This information allows the RYA to record your qualification, to update any records they may hold for you, and to verify or replace your certificate if required. For further information on how the RYA will deal with your data, please see the RYA's Privacy Policy at www.rya.org.uk/go/privacy

- b. The Disclosure and Barring Service, AccessNI and Disclosure Scotland - for instance when we process an application on your behalf
 - c. World Sailing, as required under the Racing Rules of Sailing
 - d. Employees, business partners, suppliers and sub-contractors for the performance of any contract we enter into with you, or for any service provided to us, including;
 - i. examiners, inspectors, assessors, trainers and coaches who require the information in order to provide services which you have requested or to conduct any examinations or assessments which you have
 - ii. race officers and race organisers of events held or managed by us who require the information in order to look after your welfare
 - iii. prospective employers and any other persons you may refer to us for the purpose of obtaining from us any references or verification of your qualifications or experience
 - iv. credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you
6. We may also disclose your personal information to third parties:
- a. if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, or in order to enforce or apply any contract or terms in force between you and us; or to protect the rights, property, or safety of the club, our customers, members or others. This includes exchanging information with other companies and organisations for the purposes of security, law enforcement, fraud protection and credit risk reduction
 - b. if you ask, to provide any verification of your qualifications or experience or if you refer any person to us to obtain any verification of your qualifications or experience, we may use your information to provide the verification sought
7. We will only disclose as much information as is required for the third party to fulfil the particular function and where required to do so we will have a contract in place with third parties requiring them to keep your information secure and not to use it for their own purposes.
8. We may choose to publish certain information in the public domain or the press:
- a. We may ask for your consent to use your image or certain personal information for publicity purposes.
 - b. In certain limited situations it may be in our legitimate interests to publish certain personal information about you without asking for your consent. Examples include publishing race results, mentioning you by name in press releases or articles, publishing lists of team or committee member's names or publishing decisions reached under the Racing Rules of Sailing. Before publishing such information, we will consider the potential impact publishing may have on you, and your rights, and ensure that these are not overridden by our own interests.

How long do we keep your information?

9. We may keep and process your personal information for as long as necessary to fulfil the purposes we collected it for, or for as long it is necessary to do so for legal reasons.

10. We will review your personal information regularly to establish whether we are still entitled to process it. If we decided that we are not entitled to do so, we will stop processing your personal information to the extent that it is appropriate to do so and securely delete or anonymise it.
11. To determine the appropriate retention period, we will consider the amount, nature and sensitivity of that information, the potential risk of harm from unauthorised use or disclosure, and whether we can achieve the purposes for which we process that personal information through other means.
12. When we issue a certificate to a course participant, the course name, participant name, certificate number and date of issue will be stored for up to 5 years. This information allows us to verify or replace your certificate if required.
13. In some cases, you can ask us to delete the personal information we hold about you. Please see the section below titled your rights.

Where do we store your personal information?

14. Your information may be held at our offices, or on secure servers either owned by the club or by one of our data processing partners. We have in place reasonable technological measures and operational procedures to safeguard your personal information from unauthorised access.
15. Passwords and PINs
16. Where we have given you (or where you have chosen) a password which enables you to access a club managed online system, for example, Web Collect or Dutyman, you are responsible for keeping this password confidential. We ask you not to share passwords with anyone.

Your rights

17. You have the following rights in relation to the personal information we hold about you:
 - a. to access your personal information
 - b. to be provided with information about how your personal information is processed
 - c. to have your personal information corrected
 - d. to have your personal information erased. Please be aware that erasing your personal information may prevent us from continuing to provide services to you.
 - e. to object to or restrict how your personal information is processed
 - f. to have your personal information transferred to yourself or to another business in certain circumstances
18. In many cases you can exercise these making a request to training@wembleysailingclub.co.uk.
19. You have the right to take any complaints about how we process your personal information to the Information Commissioner:

<https://ico.org.uk/concerns/>
0303 123 1113.

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire SK9 5AF