

# MYLOR YACHT CLUB LTD

## DATA PROTECTION POLICY

Note Dec 2024:

This Data Protection Policy is due for review and this will be undertaken in early January 2025.

Dear Members

Please find below the updated Data Protection Policy which MYC Ltd is legally obliged to point out to Members. We have endeavoured to present it in a form that is easy to follow and trust we have succeeded.

### About This Policy

The Club may collect, use and store your personal data, as described in this Data Protection Policy.

It may be necessary to amend the Data Privacy Policy from time to time without prior notice. You are advised to check the Club Website for any amendments to this Policy. Any amendments will not be applied retrospectively.

We shall always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the Information Commissioner's website ([www.ico.org.uk](http://www.ico.org.uk)).

### Who Are We

The data controller is Mylor Yacht Club Ltd (the Club).

### The Legal Basis on which we rely

The law on data protection defines a number of specific reasons for which a company may collect and process your personal data. The Club uses four of these reasons.

- In specific situations we can collect and process your data with your **consent**. An example of this is where we request your consent to keep you informed via newsletters.

- In certain circumstances we need your personal data to comply with our **contractual obligations**. An example of this is if you order some Club merchandise, we will collect your address details in order to deliver the item.
- In limited circumstances, we need your personal data to comply with our **legal obligations**. For example this would include our statutory obligation to provide personal data to Companies House relating to Directors, and maintaining a Register of Members of the Club.
- In specific situations we require your data to pursue our **legitimate interests** in a way which might reasonably be expected as part of running the Club and which does not materially impact your rights, freedom or interests. An example of this would be the emails or letters that we may need to send to you in support of your Membership and account.

### **Examples of when personal data may be collected include:**

- When you register an account through our Website
- When you apply for Membership of the Club
- You join any Club Committee or volunteer for the Club in any other capacity
- You join us as a member of staff, or agree to become a contractor for us
- When you join or participate in, or any child for whom you are responsible joins or participates as a Member of any of our Club run sailing development programmes
- When you participate in any Club organised Regatta or regular sailing programme
- When you register interest in a Club event, such as a Social Committee ball
- When you book a Club event on behalf of yourself and other friends
- When you undertake any training or social event run by the Club
- When you hire any of the Club's rooms
- When you purchase any Club merchandise
- When you enter any Club prize draw or competition
- When you contact us by any means with queries, complaints etc.
- When you choose to complete a Club survey that we send to you
- When you send us information and data such as Member experiences and photographs for use on the Club Website and or Club Yearbook
- When you use our facilities, which have CCTV systems, operated for the security of both Members and the Club. These systems may record your image during your visit.

## **Personal Data We May Hold**

As a Club Member personal data we may hold includes, your name, title, address, telephone numbers, date of birth, email address, joining referee names, associated family member details, occupation and emergency contact details.

We may also hold your photograph, boat details, boat Insurance details, radio call signs, a selection of areas of personal interest and any boating related qualifications that you provide.

We may also collect information you supply for the Website, Year Book or closed Facebook page.

Where applicable, the necessary consent will be sought for the taking of and use of photographs, video, etc.

If you attend a galley event, we may collect dietary records and details of your dietary requirements.

When you make a payment for an event, Membership renewal or application, room hire or Club merchandise, we do not hold card or bank account information in our systems. This financial information is collected by regulated Card Payment Services organisations in order that we may fulfil your request. We do however, hold copies of any direct debit mandate you have provided.

If you hire the Club, we may hold data pertaining to equipment, and insurance.

Information that may be provided on your behalf or at your request. Examples include bookings for training courses or other events on your behalf. If you are a minor and your parent or legal guardian provides us with information about you on your behalf. If we take up references for you or seek verification of qualifications from any referee you may have put forward.

The information about you that we may receive from other sources may include; details of your membership of other sporting bodies, e.g. class associations.

The cookie policy can be read at the bottom of the Website front page.

## **Why do we collect this data?**

When we collect personal data from you directly, we will explain the reason for collecting the personal data.

To fulfil a contract with you:

- To administer your Membership and to provide Membership information and Membership benefits to you
- To notify you about changes to your Membership benefits, facilities or services
- To provide you with any products and services that you request from us including: items purchased from us, event participation, and training services

- To permit data access and communication from Special Interest Group co-ordinators
- When you have opted in to receive email newsletters and other Club related information

When it is in our legitimate interests, and our interests are not overridden by your own interests:

- To notify you of any changes or proposed changes to boating and other related activities which we feel may be of interest to you
- To ask questions for the purposes of obtaining Member feedback on the operation of the Club such that the Club may continue to develop and support its Members
- To provide you, with information about services we feel may interest you that are similar to those that you have already obtained, purchased or enquired about
- We may process any of your personal data identified in this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of the Club's legal rights, your legal rights and the legal rights of others

Where is it part of our legal obligations, including:

- To notify you of any changes or proposed changes to the Club, it's Articles or Bye-laws, or Club Rules.

### **Where is your data stored?**

Your information may be held at our office, or on secure computers either owned by the Club or by one of our data processing partners. On occasions your information may be transferred to or stored at other locations, for instance when participating in events.

### **Protection of your data**

We will not transfer your personal data outside the E.U. without your consent.

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.

Please note however that when you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

Where you have chosen a password, which enables you to access certain parts of the Club Website, you are responsible for keeping this password confidential. We ask you not to share passwords with anyone.

For any payments which we take from you online we will use a recognised online secure payment system.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **Who else has access to the information you provide?**

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 paragraphs below.

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 . 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.

We may also pass your personal data to the Royal Yachting Association (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.

## **How long will we hold your data?**

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 Club's 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.

We securely destroy all financial information once we have used it and no longer need it.

## **Your Rights Under GDPR**

- To access your personal data
- To be provided with information about how your personal data is processed
- To have your personal data corrected
- To have your personal data erased in certain circumstances
- To object to or restrict how your personal data is processed

- To have your personal data transferred to yourself or to another business in certain circumstances

If you have any concerns about our use of your personal data, or wish to withdraw consent you can contact us at:

Company Secretary  
Mylor Yacht Club  
Mylor Churchtown  
Falmouth  
TR11 5UF

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

Helpline on 0303 123 1113

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF