



## UK Sprint 15 Class Association

### DATA PRIVACY POLICY (25th October 2019) (Ver. 2.0)

#### 1. About this policy

- 1.1 This policy explains when and why we collect personal information about our members; how we use it; 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 Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [[www.sprint15.com](http://www.sprint15.com)] or our Class Association mailings 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 on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “data controller” of all personal data we hold about you.

#### 2. Who are we?

- 2.1 We are the UK Sprint 15 Class Association. (referred to herein as ‘The Class’)

We can be contacted via The Membership Secretary. It should be noted that the personal details for the secretary may change from time to time as the person in post is elected on an annual basis at the Class Association’s AGM. The present secretary is Andrew Berisford who may be contacted at:

Harvey House, Finchingfield Road, Hampstead, CB10 2PR

Tel: 01440 730448 (landline) or 07850 834575 (mobile)

E-mail: [membership@sprint15.com](mailto:membership@sprint15.com)

Details of all other Class Association committee members can be found at: [www.sprint15.com](http://www.sprint15.com)

- 2.2 We control official Class Association communication (like the Class’s website and the Class’s official Facebook page and Twitter feed). We have no control over other websites or social media (whether unofficially linked to the Class or not) and cannot take responsibility for what appears on them, including re-posts of items from our official channels.

#### 3. What information we collect and why

Information collected, its purpose and the legal basis for processing are given below for the different categories of people with whom we deal. You may fall into more than one category. The categories are:

- Class Association members / lapsed members
- All website visitors

### 3.1 Class Association Members / Lapsed Members

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Member details:</u> Name Address Telephone number(s) E-mail address(es) Correspondence	Managing the member's membership of The Class.	Performing The Class's contract with member.	For the duration of the period during which the member is a bona-fide paid up member and for a period of two years following lapsing of annual subscription
	Creating & managing The Class's membership database	For the purposes of our legitimate interests in operating and promoting The Class.	
	Communicating with members about their membership & activities of The Class.	For the purposes of our legitimate interests in operating and promoting The Class.	
	Communicating via email using an webmail facility – Mailchimp <a href="http://www.mailchimp.com">www.mailchimp.com</a>	For the purposes of our legitimate interests in operating and promoting The Class.	
	Reporting information to the RYA.	For the purposes of the legitimate interests of the RYA to maintain data required by Sports Councils.	
	Passing name & e-mail address to the RYA or other bodies for them to conduct surveys of members of The Class. See paragraph 5.3 below. The surveys are for the benefit of The Class and / or the benefit of the RYA.	For the purpose of our legitimate interest in operating The Class and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.	
Date of birth / age / gender	Reporting information to the RYA	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.	
	Managing age and/or gender related membership categories	Performing The Class's contract with the member(s).	
Sail number	Reporting information to the RYA	For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.	
Sailing Club	To identify members and their boats	For the purposes of our legitimate interests in operating The Class.	
Committee Members Telephone number(s) E-mail address(es) Photos & videos	To provide an appreciation of the approximate geographical location of the member. To connect members of the same clubs.	For the purposes of our legitimate interests in operating and promoting The Class.	12 months after cease in role
Committee Members Meeting minutes	Information published on The Class's website, noticeboards, newsletters & other publications & marketing materials and made available to the RYA where appropriate as a point of contact at The Class.	For the purpose of our legitimate interests in operating & promoting The Class.	Indefinite
	To maintain a record of committee discussions & decisions.	For the purpose of our legitimate interest in operating and promoting The Class.	Indefinite

### 3.2 Website Visitors

Type of information	Purposes	Legal basis of processing	Retention Period
Photos & videos of members (& their boats)	For use in The Class's internal & external publicity & promotional materials including press, websites & social media platforms.	Most images would not be classified as personal data. To be personal data "it must be possible to identify an individual from information within the image or text associated with the image... being recognised by family or friends is not the same as being identified". (Source: RYA). Where images are personal data, consent will be obtained before use. In such cases the individual may withdraw their consent at any time by contacting us by e-mail or letter but should be aware that: <ul style="list-style-type: none"> <li>- It may not be possible for printed material to be taken out of circulation or altered until the next printing.</li> </ul> We can only remove images from the websites and social media that we control (see 2.2).	Indefinite
<u>Data about use of website:</u> IP address Geographical location Browser type & version Operating system Referral source Length of visit Page views Website navigation paths Timing, frequency & pattern of use	To allow us to analyse use of the website.	For the purposes of our legitimate interests in operating and promoting The Class, specifically monitoring & improving our website.	Indefinite

### 3.3 Entries to National Championship Events

Type of information	Purposes	Legal basis of processing	Retention Period
Entrants submit the following information: Name Address Email / Phone number Answer prize eligibility questions (optional) – gender, age group, weight category. Note: Payment is made by BACS or cheque so no payment details held.	To administer the National Championship entries. To enable the Association to be able to contact all entrants either before, during or after the event. To determine eligibility to award certain pre-publicised prizes. Names and prize eligibility are passed to host venue for results and prize purposes. (Note: address & contact details are not passed to the host venue)	To fulfil our contract with the entrant to run the event as publicised. For legitimate purpose of administering the National Championship entries and event.  The data is held within the entries database on the Association Website and via email in the <a href="mailto:jenny@sprint15.com">jenny@sprint15.com</a> account.	For a period of two years following the last day of the event.

### 3.4 Suppliers

Type of information	Purposes	Legal basis of processing	Retention Period
<u>Employees &amp; representatives:</u> Name Address Telephone number(s) E-mail address(es) Bank account details Correspondence	Entering & managing arrangements with suppliers.	Entering into & performing contracts with suppliers.	2 years after cease to be a supplier

#### 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 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5 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 required to do so by law or as set out in the tables 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 (e.g. to print newsletters and send you mailings). 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, not to use it for their own purposes and to delete it at the end of the contract.
- 5.3 We may also pass your personal data to the RYA for the purposes of carrying out surveys when it is in the legitimate interest of The Class 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.

## 6. How long do we keep your information?

- 6.1 We will hold your personal data on our systems as indicated in the tables above or 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 establishment 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 to or 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 and requests regarding our data processing practices to our Membership Secretary by contacting [membership@sprint15.com](mailto:membership@sprint15.com)

## Version history:

Version	Date	Remarks
1.0	21-05-2018	First Issue
2.0	25-10-2019	Updated to correct formatting issues. Clause 5.3 added