

CVSS

Sailing for People with Disabilities

DATA PRIVACY POLICY

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members and volunteers, how we use it and 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 cvssailors.org.uk 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.org.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.
- 1.5 We have identified “Legitimate Interests” as our lawful basis for processing your data under **Article 6 of the GDPR**. The main purpose of which is to manage your membership with CVSS safely and securely. This applies to all members of CVSS including our volunteers and at all times to protect the interests of each individual.
- 1.6 We also have identified and process sensitive personal data which is referred to as “Special Categories of personal data” under **Article 9 (2A) and 9(2C) of the GDPR**. The main purpose of which is to manage your membership and that of our volunteers who fall within this category safely and securely and to protect the interests of each individual.
 - 1.6(a) Under 9(2A) as referred to above, the data subject has given **explicit consent** to the processing of those personal data for one or more specific purposes.
 - 1.6(b) Under 9(2C) as referred to above, processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

2. Who are we?

2.1 We are Colne Valley Special Sailors (Identified as CVSS within this policy) (Charity 1155165).

2.2 We can be contacted at chair@cvssailors.org.uk

3. What information we collect and why

<i>Type of information</i>	<i>Purposes</i>	<i>Legal basis of processing</i>
Member's name, Address, Telephone numbers, email address(es)	Managing the Member's membership of CVSS safely and securely. Managing the volunteer's duty roster.	Performing CVSS's contract with the Member For the purposes of our legitimate interests in operating CVSS
Details about our members' health under special category data of the GDPR	Managing the membership of CVSS safely and securely	For the purposes of our Legitimate Interests in making sure we perform CVSS's contract with the member. Explicit consent under 9(2a) of the GDPR will be sought. Where this has not been possible because of incapacities consent will be sought under 9(2c) of the GDPR to protect vital interests and those of dependants.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of CVSS	Performing CVSS's contract with the Member.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants.
Date of birth/age related information	Managing membership categories which are age related	Performing CVSS's contract with the Member.
Gender	Provision of adequate facilities for members. Reporting information to the RYA.	For the purpose of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of the legitimate interests of the RYA to maintain diversity

		data required by Sports Councils.
Photos and videos of members	Putting on CVSS's website and social media pages and using in press releases.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by e-mail or letter.
The Member's name and e-mail address	Creating and managing CVSS online	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.
Bank account details of the member or other person making payments to and from CVSS	Managing the Member's and their dependants' membership of CVSS the provision of services and events.	Performing CVSS's contract with the Member.
Member's name and e-mail address	Passing to the RYA for the RYA to conduct surveys of members of CVSS (and members of other clubs affiliated to the RYA). This information is supplied in the form of anonymous statistical data and no member or volunteer of CVSS can be identified individually. The surveys are for the benefit of CVSS (and other clubs) and/or the benefit of the RYA.	For the purposes of our legitimate interests in operating CVSS and/or the legitimate interests of the RYA in its capacity as the national body for all forms of boating.
Volunteer's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing duties safely and securely at CVSS	For the purposes of our legitimate interests in ensuring that we can contact those who volunteer and provide details of volunteers

		to CVSS leaders.
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4. How we protect your personal data?

- 4.1. We will not transfer your personal data outside of CVSS.
- 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 table above.

6. How long do we keep your information?

- 6.1. We will hold your personal data on our systems for as long as you are a member of CVSS and 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 of 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 party in certain circumstances
- 7.2 To 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 Chair at chair@cvssailors.org.uk