



## Ballyholme Yacht Club

### Data Protection Policy

#### 1. Our commitment

Ballyholme Yacht Club ('the Club') is committed to complying with its legal obligations with regard to the Data Protection Act 1998 and subsequent legislation. The Club collects and processes personal data relating to members, employees and others in the normal course of administering membership and running the Club.

This policy covers the processing of any individual's personal data by the Club which may include both current and former members. The processing of data includes collection, recording, storage, verification, presentation, editing and destruction.

#### 2. Data Collection & Recording

a: Personal data will be collected by the Club from membership application and renewal forms, boat park forms, training course application forms, and event entry forms completed (or confirmed where the form is pre-populated with data, eg membership renewal) in printed and on-line formats. The Club will collect the minimal personal information required to manage, administer and promote its activities in accordance with the Objects of the Club (see *Club Rule 2*). From time to time, the Club may also request further information to assist with planning and management. Any analysis of the personal data held by the Club will as far as possible be performed on an 'anonymous' basis and will minimise identification of individuals.

b: At organised events (eg training courses, Annual Regatta, etc) the Club may commission and/or use photographs to record the event and promote the club via the website and newsletter : photographs which include individuals under 18 years will also be subject to the Club's Child Protection Policy & its procedures.

c: The Club routinely collects images from security and door-entry cameras.

#### 3. Data Storage & Security

Personal data held by the Club is stored as follows :

a: Data extracted from application, renewal and entry forms is entered on a database system to facilitate the administration of membership and communications with the members : the database system is protected by physically restricted access and by electronic restrictions including off-site back-up.

b: Completed paper forms for membership and boat park space application and renewal forms are securely filed and protected by physically restricted access.

c: Outside of the provisions of 2b above, any photographs taken on organised sailing days will be stored in digital form protected by physically restricted access and by electronic restrictions.

d: Security camera images are held in electronic form on a separate dedicated system protected by physically restricted access.

The Club will ensure that personal data will be processed in accordance with the principles of data protection all as set out in the Data Protection Act 1998.

The Club will take all reasonable steps to ensure that appropriate security measures are in place to maintain and protect the confidentiality of both electronic and paper data.

#### 4. Data Security & Disclosure

a: Personal data collected as part of membership and other applications or renewals will not be disclosed to third parties, except where required or authorised by law, or with the prior agreement of the member. The information stored will only be used to support the administration of the club.

Limited personal data may be made available through the Club Office to those members who need it to perform their designated function within the Club, and if appropriate, to accredited representatives of relevant sports clubs.

The Club may share non-personal statistical or summary information with other organisations working in partnership (eg the Royal Yachting Association).

b: Re photographs described in 2(b) above, some or all may be used to help promote and illustrate the Club's activities via the website and newsletter. Members declare as part of the application or renewal process that they consent to this use.

c: Security camera images are automatically overwritten after 4 weeks, unless an incident has arisen which necessitates their review.

## **5. Access Requests**

Members are entitled to request a copy of their personal data held on computer, or to request a photocopy of original completed application forms where these are still available.

The Club Manager will provide this information promptly on request, ensuring security of the data to be supplied. The time limitations of the security camera system should be noted in respect of access requests.

## **6. Responsibility**

The Executive Committee bears overall responsibility for ensuring compliance with the Data Protection Act 1998 and subsequent legislation. The Club is the Data Controller for the purposes of the Data Protection Act 1998.

The Club Manager and the Honorary Secretary will answer queries or deal with members' concerns about data protection in the Club.

## **7. Review**

This policy will be reviewed from time to time as required to take into account changes in legislation and the experience of the policy in practice.