

# Ballyholme Yacht Club

## Data Protection Policy

*Last amended: March 2026*

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### 1. Our Commitment

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Ballyholme Yacht Club ('the Club') is committed to complying with its legal obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and any 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.

The Club is the Data Controller for the purposes of the UK GDPR and the Data Protection Act 2018. The Executive Committee bears overall responsibility for ensuring compliance with data protection legislation.

### 2. Data Collection & Recording

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#### 2(a) Membership and Administrative Data

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, e.g. 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.

The lawful basis for processing membership and administrative data is legitimate interests (to administer the Club's activities and membership) and, where applicable, legal obligation. The Club processes only the minimum data necessary for these purposes in accordance with the data minimisation principle under UK GDPR.

#### 2(b) Photographs at Organised Events

At organised events (e.g. training courses, Annual Regatta, racing days, and similar Club activities), the Club may commission and/or take photographs to record the event and promote the Club via its website, social media channels, and newsletter.

##### **Adults (members and participants aged 18 and over)**

The lawful basis for processing photographic images of adults is consent. Consent is collected as a distinct, standalone opt-in on the membership application and renewal form — separate from the general terms of membership. Members are not required to consent to

photography as a condition of membership, and consent may be withdrawn at any time by contacting the Club Manager in writing. Withdrawal of consent will not affect the lawfulness of any processing carried out prior to withdrawal, but the Club will take reasonable steps to remove identifiable images from future publications where practicable.

Where individuals who are not Club members appear in photographs taken at Club events (e.g. visiting competitors or guests), the Club will seek consent from those individuals before publishing or using such images.

### **Children and young people (members and participants under 18)**

Photographs of individuals under 18 are subject to additional protections. The lawful basis for processing such images is the explicit consent of a parent or guardian, collected via the Club's online junior membership application and renewal form, which requires a parent or guardian sign-off. Consent for the photography and publication of images of under-18s is sought separately from general membership consent, and parents or guardians may withdraw consent at any time by contacting the Club Manager in writing.

Images of under-18s will not be published alongside personal information (such as full name, school, or home location) that could identify or locate a child. All use of images of under-18s is also governed by the Club's Child Protection Policy, and any concerns should be directed to the Club's Child Protection Officer.

## **2(c) Security Camera Images**

The Club routinely collects images from security and door-entry cameras. The lawful basis for this processing is legitimate interests (to maintain the security of Club premises and property).

## **2(d) Children and Young People's Personal Data**

The Club is committed to handling the personal data of children and young people (those under 18) with particular care, in line with its Child Protection Policy and the ICO's guidance on children's data.

### **Data collected for junior members**

Personal data collected for junior membership is provided by, or with the authorisation of, a parent or guardian via the Club's online junior membership application and renewal form. The Club collects only the minimum data necessary to administer junior membership and ensure the safety and welfare of young members. This may include the child's name, date of birth, emergency contact details, and relevant medical or health information provided voluntarily for safety purposes.

### **Parental and guardian responsibility**

A parent or guardian must complete or authorise the online application form for any member under 18. By doing so, the parent or guardian confirms they have the authority to provide the child's personal data and consents to its use in accordance with this policy. Parents and guardians may exercise data subject rights (see Section 5) on behalf of their child.

### **Access and disclosure**

Personal data relating to under-18s will only be accessible to Club staff and volunteers who require it to fulfil their designated role. Such data will not be shared beyond the disclosures described in this policy without the explicit consent of a parent or guardian, except where required by law or where necessary to protect the safety and welfare of a child.

### **Safeguarding**

Any processing of children's data in the context of safeguarding concerns will be handled in accordance with the Club's Child Protection Policy. The Club's Child Protection Officer has responsibility for overseeing compliance with safeguarding obligations and may be contacted via the Club Office. Where there is a conflict between data protection obligations and the safety of a child, the safety of the child will take precedence.

### 3. Data Storage & Security

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Personal data held by the Club is stored as follows:

- Data extracted from application, renewal and entry forms is entered on a database system to facilitate the administration of membership and communications with members. The database system is protected by physically restricted access and by electronic restrictions including off-site back-up.
- Completed paper forms for membership and boat park space application and renewal forms are securely filed and protected by physically restricted access.
- Outside of the provisions of 2(b) above, any photographs taken on organised sailing days will be stored in digital form protected by physically restricted access and by electronic restrictions.
- 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 is processed in accordance with the principles of data protection as set out in the UK GDPR. 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

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#### 4(a) General Disclosure

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 (e.g. the Royal Yachting Association).

#### 4(b) Use of Photographs for Promotional Purposes

Photographs taken at organised Club events, as described in Section 2(b), may be used to promote and illustrate the Club's activities via the website, newsletter, and social media channels, subject to the following:

- For adults, use is permitted only where valid opt-in consent has been collected as described in Section 2(b). The Club will maintain a record of consents given and withdrawn.

- For under-18s, use is permitted only where explicit parental or guardian consent has been collected and remains in force.
- Where consent is withdrawn, the Club will take reasonable and practicable steps to remove the relevant images from future publications. The Club acknowledges that images already in circulation (e.g. in printed materials or indexed by third-party platforms) may not be fully retrievable, and will document the steps taken.
- The Club will not tag or caption images of under-18s with personal information that could identify or locate a child.

#### 4(c) Security Camera Images

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

#### 4(d) Sharing with Governing Bodies and Affiliated Organisations

The Club may share personal data with national and international sailing governing bodies and their affiliated organisations, including but not limited to the Royal Yachting Association (RYA), Irish Sailing, World Sailing, and clubs affiliated with the above, where necessary for the following purposes:

- Registration for competitions, regattas, and events
- Processing of racing licences, rankings, and results
- Issue and verification of sailing qualifications and certificates
- Fulfilment of the Club's obligations as an affiliated member of these organisations

The lawful basis for such sharing will be one or more of the following, depending on the circumstances:

- Contractual obligation — where sharing is necessary to deliver a service or fulfil an agreement the member has entered into (e.g. race entry, certification)
- Legitimate interests — where sharing is necessary for the Club's administration of its membership and its obligations as an affiliated organisation
- Consent — where the member has specifically agreed to their data being shared for a particular purpose

Where data is transferred to organisations based outside the United Kingdom, including those in the Republic of Ireland or further afield, the Club will ensure that adequate protections are in place in accordance with UK GDPR requirements for international data transfers. Personal data will only be shared to the extent necessary for the stated purpose.

## 5. Individual Rights

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Under the UK GDPR, members and other individuals whose data the Club holds have the following rights:

- Right of access: to request a copy of the personal data the Club holds about you.
- Right to rectification: to request correction of inaccurate or incomplete personal data.
- Right to erasure: to request deletion of your personal data in certain circumstances.
- Right to restrict processing: to request that the Club limits how it uses your data.

- Right to object: to object to the processing of your personal data where it is based on legitimate interests.
- Right to data portability: to request that data you have provided is transferred to you or another organisation in a structured, commonly used format.
- Right to withdraw consent: where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing carried out before withdrawal.

The Club Manager will respond to any such requests promptly and in accordance with the timescales required by UK GDPR (generally within one calendar month). Members may also request a photocopy of original completed application forms where these are still available. The time limitations of the security camera system should be noted in respect of access requests.

## 6. Right to Complain to the Information Commissioner's Office (ICO)

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If you have a concern about the way the Club is handling your personal data, we ask that you first raise it with us directly by contacting the Club Manager or the Honorary Secretary (see Section 7 below). We will investigate and respond to your complaint promptly and in accordance with UK GDPR timescales.

If you are not satisfied with our response, or if you believe that the Club is not processing your personal data in accordance with the law, you have the right to lodge a complaint with the UK's supervisory authority:

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*Information Commissioner's Office (ICO)*

*Website: [www.ico.org.uk](http://www.ico.org.uk)*

*Helpline: 0303 123 1113 (Monday to Friday, 9am – 5pm)*

*Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF*

*Online complaint form: [ico.org.uk/make-a-complaint](http://ico.org.uk/make-a-complaint)*

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You may contact the ICO at any time; however, the ICO will generally expect you to have raised the matter with the data controller first. The Club's full privacy notice, which provides additional information about how we use your data and your rights, is published on the Club website.

## 7. Responsibility

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The Executive Committee bears overall responsibility for ensuring compliance with the UK GDPR and the Data Protection Act 2018. The Club is the Data Controller for the purposes of this legislation.

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

## 8. Review

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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.

*Last amended: March 2026*