

BALLYHOLME YACHT CLUB

Privacy Policy

Effective date: March 2026 | Last amended: March 2026

1. About Us — Who is the Data Controller?

Ballyholme Yacht Club ("us", "we", or "our") is the data controller in respect of personal data collected through our website at www.ballyholme.com and in connection with membership and Club activities.

The Club is an unincorporated members' association. The person responsible for data protection matters at the Club is:

Club	Ballyholme Yacht Club
Address	Ballyholme Yacht Club, Ballyholme Esplanade, Bangor, County Down, BT20 5PS
Email	admin@ballyholme.com
Phone	028 9127 1467
Data Protection Contact	The Club has not formally appointed a Data Protection Officer (DPO) as it is not legally required to do so. All data protection queries should be directed to the Club Administrator at admin@ballyholme.com.

We process your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Information We Collect

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. This may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, County, Post Code, City
- Date of birth (for membership administration and junior sailing)
- Medical or health information (where provided for safety purposes)
- Emergency contact details
- Sailing qualifications and licences
- Cookies and Usage Data

The lawful basis for processing this personal data is legitimate interests (to administer membership and Club activities), contractual obligation (where processing is necessary to deliver a service you have requested), and consent (where you have specifically agreed to the use of your data for a particular purpose).

Special Category Data

In limited circumstances, the Club may process special category data as defined by UK GDPR Article 9. This includes:

- Health or medical information: collected where a member or participant volunteers this information for their own safety (e.g. on first aid or event entry forms). This is processed on the basis of explicit consent or where processing is necessary to protect the vital interests of the individual.
- Criminal conviction data (DBS checks): where required for individuals working with children or vulnerable adults as part of the Club's safeguarding obligations. This is processed on the basis of legal obligation and the substantial public interest condition.

You are never required to provide health information unless it is necessary for your participation in a specific activity. Any such data will be treated with the highest level of care and access will be strictly limited.

Children's Data

Ballyholme Yacht Club operates a junior section and may collect personal data relating to members under the age of 18. Where we collect data about a child under 13, we will seek the consent of a parent or guardian.

Personal data relating to children will only be used for the purposes for which it was collected (e.g. membership administration, racing, RYA qualification processing, safeguarding) and will not be used for any marketing or unrelated purpose.

Parents and guardians have the same rights in respect of their child's data as they would in respect of their own data, and may exercise those rights by contacting us at admin@ballyholme.com.

CCTV

The Club operates closed-circuit television (CCTV) cameras on its premises for the purposes of security and crime prevention. CCTV footage is processed on the basis of our legitimate interests in protecting Club property and the safety of members and visitors.

CCTV footage is retained for a maximum of 31 days and then automatically overwritten, unless footage is required to be preserved in connection with an incident, investigation, or legal proceedings. Access to CCTV footage is restricted to authorised Club officials and, where required, law enforcement.

Signage is displayed at the entrance to areas covered by CCTV to ensure individuals are aware that recording is taking place.

Photography and Video

The Club may take photographs and video footage at Club events, races, and activities for the purposes of promoting the Club, celebrating achievements, and maintaining a historical record of Club activities. Where photographs or video include identifiable individuals, we will process this data on the basis of:

- Consent: where we have obtained prior consent from the individual (or their parent/guardian for those under 18); or
- Legitimate interests: where photographs are taken at public-facing Club events and their use is in keeping with reasonable expectations.

You may withdraw your consent for the use of your image at any time by contacting admin@ballyholme.com. We will remove or cease use of your image as soon as reasonably practicable following receipt of a withdrawal request.

Photographs and video footage of children will only be taken and used with the explicit consent of a parent or guardian. The Club will not publish images of children that identify them by name without parental consent.

Transactional Information

No personal payment information is stored on this website. Payments are processed securely through our third-party payment providers, Stripe and Smart Club Solutions. Please refer to their respective privacy policies for details of how they handle your payment data.

Usage Data

We may also collect information about how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. This data is processed on the basis of our legitimate interests in maintaining and improving our Service. We use Google Analytics, a web analytics service provided by Google LLC, to help us understand how our website is used. Google Analytics collects Usage Data via cookies and provides us with aggregated, anonymised reports. It does not identify you as an individual. See the Tracking and Cookies Data section below for more detail and opt-out options.

Tracking and Cookies Data

We use cookies and similar tracking technologies to track activity on our Service and hold certain information. Cookies are small data files which may include an anonymous unique identifier, sent to your browser from a website and stored on your device.

In accordance with the Privacy and Electronic Communications Regulations (PECR), we will request your consent before placing any non-essential cookies on your device. You may withdraw your consent at any time by adjusting your browser settings. Please note that refusing non-essential cookies may affect your ability to use some parts of our Service.

The types of cookies we use are:

- Session Cookies: used to operate our Service.
- Preference Cookies: used to remember your preferences and settings.
- Security Cookies: used for security purposes.
- Analytics Cookies: we use Google Analytics to collect anonymised information about how visitors use our website, including pages visited, time spent on the site, and general location. Google Analytics uses its own cookies to track this activity. The data collected is aggregated and does not identify you personally. Google Analytics data may be transferred to and stored on servers in the United States; Google operates under standard contractual clauses and other appropriate safeguards in accordance with UK GDPR requirements. You can opt out of Google Analytics tracking at any time by installing the Google Analytics Opt-out Browser Add-on, available at tools.google.com/dlpage/gaoptout, or by declining analytics cookies via our cookie consent tool. For more information on how Google uses your data, please visit www.google.com/policies/privacy/partners/.

3. How We Use Your Data

Ballyholme Yacht Club uses the collected data for the following purposes, each supported by an appropriate lawful basis under UK GDPR:

- To provide and maintain the Service
- To administer your Club membership
- To notify you about changes to our Service or membership arrangements
- To allow you to participate in Club events, races, and activities
- To process entries for competitions, regattas, and events
- To fulfil safeguarding obligations in respect of junior and vulnerable members
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent, and address technical issues

4. How Long We Keep Your Data

We will not keep your personal data for longer than is necessary for the purpose for which it was collected. The table below sets out our standard retention periods by data category. Where a statutory or regulatory period applies, that period takes precedence.

Data Category	Examples	Retention Period
Membership records	Name, address, contact details, membership history	Duration of membership + 7 years
Financial records	Payment confirmations, subscription records	7 years (statutory requirement)
Racing records	Race entries, results, rankings, licences	Indefinitely (sporting record)
Junior member records	Name, DOB, parent/guardian contact, medical notes	Until age 18 + 3 years, or 7 years from last activity
Safeguarding records	DBS checks, incident reports, concerns logged	As directed by statutory guidance (minimum 10 years)
Health / medical information	First aid forms, medical conditions declared	3 years after last activity
Website usage data	IP addresses, cookies, analytics	Up to 26 months
CCTV footage	Premises security recordings	31 days, unless retained for an incident
Photography / event images	Photos and video from Club events	As long as consent remains valid; withdrawn on request

On expiry of the applicable retention period, data will be securely deleted or anonymised. If you have questions about the retention of a specific category of data, please contact us at admin@ballyholme.com.

5. Automated Decision-Making and Profiling

Ballyholme Yacht Club does not use automated decision-making processes or profiling in relation to your personal data. No decisions which produce legal or similarly significant effects on you are made solely by automated means.

6. Sharing Your Data

Governing Bodies and Affiliated Organisations

We may share your 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
- Racing results for competitions, regattas, and events
- Processing of racing licences, rankings, and results
- Issue and verification of sailing qualifications and certificates
- Fulfilment of our obligations as an affiliated member of these organisations

The lawful basis for such sharing will be one or more of the following: contractual obligation (e.g. race entry or certification), legitimate interests (Club administration and affiliation obligations), or consent (where you have specifically agreed).

Where data is shared with organisations based outside the United Kingdom, including Irish Sailing (Republic of Ireland) or World Sailing and other international bodies, we will ensure that adequate protections are in place in accordance with UK GDPR requirements for international data transfers.

Service Providers and Processors

Personal information will not be shared with any third-party services, with the following exceptions:

- Payment processing: when a payment is required, basic information will be shared with Stripe or Smart Club Solutions to process the transaction. Stripe is a US-based company; your data may therefore be transferred outside the United Kingdom. Stripe operates under standard contractual clauses and other appropriate safeguards in accordance with UK GDPR requirements for international transfers. Please refer to the Stripe and Smart Club Solutions privacy policies for full details.
- RYA certification: when we must register a certificate with the RYA, we will only do this with your consent.
- Website hosting and IT services: our website hosting provider may process limited technical data as a processor acting on our behalf under a data processing agreement.
- Safeguarding bodies: where required by law or safeguarding policy, limited personal data may be shared with statutory agencies or the RYA's safeguarding team.
- Governing bodies and affiliated organisations: as described in the section above.

Legal Requirements

Ballyholme Yacht Club may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Ballyholme Yacht Club
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

7. International Transfers of Data

Some of the third parties with whom we share data are based outside the United Kingdom, specifically:

- Stripe (USA): operates under standard contractual clauses approved for UK GDPR purposes.
- World Sailing and other international governing bodies: transfers are made where necessary for race entry, results processing, and certification, and are subject to appropriate safeguards.

We will only transfer your data outside the UK where we are satisfied that adequate legal protections are in place. If you have any questions about the safeguards applicable to a specific transfer, please contact us at admin@ballyholme.com.

8. Security of Your Data

The security of your data is important to us. We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, destruction, or disclosure. While we strive to use commercially acceptable means to protect your Personal Data, please be aware that no method of transmission over the Internet or method of electronic storage is 100% secure and we cannot guarantee its absolute security.

9. Your Rights

Under the UK GDPR, you have the following rights in relation to the personal data we hold about you:

- Right of access: to request a copy of the personal data we hold 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 we limit how we use 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 prior processing.
- Right to complain: you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk if you believe your data protection rights have been infringed.

To exercise any of the above rights, please contact us at admin@ballyholme.com or by phone on 028 9127 1467. We will respond to your request within one calendar month.

You do not need to pay a fee to exercise your rights in most circumstances. If your request is manifestly unfounded or excessive, we may charge a reasonable fee or decline to act on the request.

10. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third party sites or services.

11. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any material changes by email to the address registered with the Club, and by posting the new Privacy Policy on this page and updating the effective date above.

You are advised to review this Privacy Policy periodically for any updates. Continued membership of or engagement with the Club following notification of changes constitutes acceptance of the updated policy.

12. Contact Us

If you have any questions about this Privacy Policy or how your personal data is handled, please contact us:

- By email: admin@ballyholme.com
- By phone: 028 9127 1467
- By post: Ballyholme Yacht Club, Ballyholme Esplanade, Bangor, County Down, BT20 5PS

If you have concerns about how your data is being handled, you also have the right to lodge a complaint with the Information Commissioner's Office:

- Website: www.ico.org.uk
- Helpline: 0303 123 1113