



DATA PRIVACY POLICY

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members, 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 (www.hoeoca.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.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

- 2.1 We are the Heart of England Offshore Cruising Association or HOEOCA (“the Club”). We can be contacted at hoeoca.secretary@gmail.com or through our website www.hoeoca.org.uk.

3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Keeping in touch with the Member (including by newsletter).	Performing the Club's contract with the Member for the purposes of our legitimate interests in operating the Club. For the purposes of our legitimate interests in operating the Club.
Name and hoeoca allocated email address of each Club committee member	Information published on Club's website	For the purposes of our legitimate interests in operating the Club.
Emergency contact details.	Contacting next of kin in the event of emergency.	Protecting the Member's vital interests and those of their dependants
Gender, ethnicity, date of birth and sailing experience	Managing the allocation of boat berths safely and appropriately. Reporting aggregated information to the RYA.	Protecting the Member's interests. For the purposes of our legitimate interests in monitoring equality data and reporting this to the RYA and Sports Councils as required.
Photos and videos of Members and their boats	Putting on the Club's website and social media	Consent. We will seek the Member's consent as appropriately and the

	pages and using in press releases.	Member may withdraw their consent at any time by contacting us by e-mail or letter.
--	------------------------------------	---

4. How we protect your personal data

- 4.1 To manage your membership of the Club and communicate with you, it may sometimes be necessary for us to transfer your personal data outside the United Kingdom. However, we will only do so in accordance with the Act that is most likely to involve either approval that the country to which your data is being transferred provides adequate protection for personal data or on the basis of agreeing standard contractual clauses with the organisation to which we are transferring your data.
- 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 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 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 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 for as long as you are a member of the Club and for as long afterwards as it is in the Club’s legitimate interest to do so or for as long 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 explained

- 7.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you

wish us to exercise any of your rights outlined above please contact hoeoca.secretary@gmail.com

- (a) The right to be informed (knowing how we will use your data). You have the right to be told how we will use your Personal Data - which is set out in This Notice.
- (b) The right of access (being provided with copies of your data). You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.
- (c) The right of rectification (changing incorrect information we hold). If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.
- (d) The right to be forgotten (requesting deletion of your Personal Data). In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).
- (e) The right to restrict processing (limiting how we use your data). In certain situations, you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.
- (f) The right to data portability (moving your data in a useable format). You have the right to request the Personal Data you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party - in certain situations.
- (g) The right to object (when we must stop processing your data). You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights, and freedoms; or the processing is for the establishment, exercise, or defence of legal claims.
- (h) The right not to be subject to automated decision-making including profiling (deciding solely by automated means without any human involvement). The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you

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 secretary (hoeoca.secretary@gmail.com).