

# HUNTER ASSOCIATION - DATA PRIVACY POLICY

*With acknowledgements to the RYA for their work on this topic, among other things a most helpful set of templates, on which this and the other GDPR documents are based.*

## 1. About this Policy

- 1.1 Personal data relates to an identifiable person who can be identified from the data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession, or likely to come into such possession. The processing of personal data is governed by the Data Protection Act 2018 which implements the EU General Data Protection Regulation (the 'GDPR').
- 1.2 This policy explains when and why we, the Committee and Web Managers of the Hunter Association, collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.
- 1.3 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. On joining, all prospective members are required to check a box to say they have read the privacy policy.
- 1.4 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website Library regularly.
- 1.5 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](http://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?

The Hunter Association, and we can be contacted at: [secretary@hunterassociation.org.uk](mailto:secretary@hunterassociation.org.uk)

## 3. What information we collect and why

- 3.1 We are required to have a Lawful Basis for processing. We use two of the allowed bases, as indicated in the table below.
  - Consent, where you tick a check box or supply optional information in your profile. You may withdraw this consent at any time, by unticking the checkbox or deleting the information.
  - Legitimate interest, where the information is necessary for the purposes of operating the Association. Members who do not wish legitimate interest information to be processed may contact the Membership Secretary by e-mail to tell us that they no longer wish their details to be maintained in the Membership Database. However, this will mean that their membership will terminate.

<b>Type of information</b>	<b>Purposes</b>	<b>Lawful basis for processing</b>
Member's name, address, telephone numbers, e-mail address.	Managing the Member's membership of the Club and performing the Association's contract with the Member.	Legitimate interest. Address required for magazine etc. mailings. Email address required for important communications and to send subscription reminders.
The first name of the Member's Spouse or partner.	Managing the social aspects of membership of the Association	Consent. This is an optional question.
Title, e.g. Mr., Ms. etc., which may imply gender.	Correct addressing of correspondence and member communications	Legitimate Interest
Member's home town, email address and telephone number	For display to members in the Member's online Profile and for allowing Member to Member communication.	Consent. We seek the Member's consent by checkbox on their membership application form/online Profile for these data to be displayed. This consent can be withdrawn by checking Ex-Directory in Privacy Settings.
Member's e-mail address	Sending occasional mass-emails advertising Association events, offers, requests etc.	Consent. We seek the Member's consent by checkbox on their membership application form/online Profile for receipt of emails from the Association. This consent can be withdrawn by deselecting check boxes in Mail Preferences.
Boat name, type and sail number	To maintain a register of Hunter boats and to establish the bona fides of members.	Legitimate Interest
Telephone number and MMSI	To ensure that members' 'on the water' information is available to members for the purpose of identifying other members and their boats when met on the water or in marinas, moorings, etc., and to facilitate communication between members' boats on the water, especially during rallies.	Consent. Telephone number visibility is controlled by using the Ex-Directory setting. MMSI is optional information (although we encourage Members to supply this information)

Type of information	Purposes	Lawful basis for processing
Photos and videos of members and their boats	Posting on the Association's website and social media pages.	Consent. Only posed photos or videos, taken at private Association events (e.g. AGM, rally meals), will be posted by Association officers. We advise members to keep out of such photographs if they are unhappy to be in them. Note that we are not responsible for any photos or videos that other individuals may choose to post.

#### 4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the EEA without your consent, but it may be viewed by members who are outside the EEA. (GDPR is an EEA regulation to which the UK is a party. If that changes with the status of the UK, we will update the policy accordingly.)
- 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 that we take from you online we will use a recognised online secure payment system. We do not store any account numbers or card details on the website.
- 4.5 We will notify you promptly in the event of any breach of your personal data that 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 print newsletters and 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.
- 5.3 We may also pass your personal data to the RYA for the purposes of carrying out surveys when it is in the legitimate interest of the club and the RYA to do so. The RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary

for the third party to do so and will have a contract in place that require the third party 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 Association and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data periodically 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 exercise or defence of legal claims relating to the Association.

6.2 When a member cancels membership of the Association we will retain certain information for historical purposes, this includes: member name, boat details (name/type/sail number), date of registration and date of cancellation. Members may, if required, request this to be deleted at time of cancellation. Additionally on cancellation of membership, any forum posts completed by the Member are retained together with the Member's name for historical purposes.

6.3 We do not collect or retain any credit/debit card or bank account details.

## **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 business in certain circumstances.

7.2 Note that all the information that we hold about you is always accessible to you in your online Profile, and most of it is editable by you.

7.3 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 Admin Secretary at [secretary@hunterassociation.org.uk](mailto:secretary@hunterassociation.org.uk).