



Holy Loch **Sailing Club** SCIO
Sandbank, Dunoon, Firth of Clyde

Holy Loch Sailing Club

Data Privacy & Processing Policy



Review due March 2027

Dated 30 March 2025





Holy Loch Sailing Club (HLSC) Data Privacy & Processing Policy

1. About this Policy

- 1.1.** This policy explains when and why we collect personal information about our members and instructors, 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 and Processing Policy, and as described when we collect data from you.
- 1.3.** We reserve the right to amend this Data Privacy and Processing Policy from time to time without prior notice. You are advised to check our website www.hlsc.co.uk or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).
- 1.4.** We will always comply with the UK General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the UK GDPR can be found at the website for the Information Commissioner (www.ico.org.uk). For the purposes of the UK GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

- 2.1.** We are the Holy Loch Sailing Club SCIO. We can be contacted at Holy Loch Sailing Club, Sandbank, Dunoon, PA23 8QB or by email to: info@hlsc.co.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. Managing the duty roster. Performing the club's contract with the member.	For the purposes of our legitimate interests in operating the club.
The names and ages of the member's dependants	Managing the member's and their dependants' membership of the club	Performing the club's contract with the member



Emergency contact details	Contacting next of kin in the event of emergency	Protecting the member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the club's contract with the member.
Gender	Provision of adequate facilities for members. Reporting information to the RYA.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of the legitimate interests of the RYA to maintain diversity data required by Sports Councils.
Declared medical conditions and additional accessibility needs	Provision of adequate facilities for members. Contacting next of kin in the event of emergency	For the purposes of our legitimate interests in running the club in the interests of members.
The member's name, boat name and sail number	Managing race entries and race results. Allocating moorings and storage spaces.	For the purposes of our legitimate interests in holding races for the benefit of members of the club. For the purposes of our legitimate interests in operating the club.
Photos and videos of members and their boats	Putting on the club's website and social media pages and using in press releases.	Consent. We will seek the member's consent on their membership application form and each membership renewal form and the member may withdraw their consent at any time by contacting us by e-mail or letter.



Radio call signs	Collected for a rally and shared between those participating in the rally.	For the purposes of our legitimate interests in ensuring that boats on a rally can maintain contact with each other
The member's name and email address.	Creating and managing the club's Membership Directory / Handbook.	Consent. We will seek the member's consent on their membership application form and each membership renewal form. The member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory / Handbook
Member's name and email address	Passing to the RYA for the RYA to conduct surveys of members of the club (and members of other clubs affiliated to the RYA). The surveys are for the benefit of the clubs (and other clubs) and / or the benefit of the RYA.	For the purposes of our legitimate interests in operating the club and / or the legitimate interests of the RYA in its capacity as the national body for all forms of boating
Member's name, address, and boat details	Passing to the Crown Estates or their agents to assist in the management of the club's moorings	For the purposes of our legitimate interests in operating the club
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience	Managing instruction at the club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.
Member's name, email addresses, phone numbers and relevant qualifications and/or experience	Managing volunteering activity at the club	For the purposes of our legitimate interests in operating the Club – finding suitably qualified / experienced volunteers.



<p>Member's name and addresses, the date on which they were registered as a member of the club.</p> <p>In addition, for an individual nominated for a Business Member, the name of the body which nominated them for membership.</p>	<p>To comply with the club's Scottish Charitable Incorporated Organisation (SCIO) constitution and to meet OSCR's requirements</p>	<p>For the purposes of our legitimate interests in operating the Club – regulatory requirements from OSCR.</p>
<p>For each former member - for at least six years from the date on which they ceased to be a member: - their name and date on which they ceased to be a member.</p> <p>In addition, for an individual nominated for a Business Member, the name of the body which nominated them for membership.</p>	<p>To comply with the club's Scottish Charitable Incorporated Organisation (SCIO) constitution and to meet OSCR's requirements</p>	<p>For the purposes of our legitimate interests in operating the Club – regulatory requirements from OSCR.</p>
<p>For each former member - for at least six years from the date on which they ceased to be a member: - membership details including name, addresses, email addresses, declared medical conditions, additional accessibility needs, subscription and fees details relating to financial transactions.</p>	<p>To comply with the requirements of Scottish Charity Accounting.</p> <p>In case of future disputes.</p>	<p>For the purposes of our legitimate interests in operating the Club – regulatory requirements Scottish charity accounting.</p> <p>In case of future disputes.</p>

4. How we protect your personal data

4.1. We will not transfer your personal data outside the EEA without your consent.

4.2. We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, or



unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

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 you make online and electronically we will use a recognised online secure payment system. Details are stored by these providers not the club.

4.5. For safeguarding purposes we use a specific password protected email address (safeguarding@hlsc.co.uk) and all details are stored under the Protection of Vulnerable Groups (PVG) Scheme (www.mygov.scot/pvg-scheme) not by the club.

4.6. When using bulk email to members, the Webcollect system automatically uses 'blind copy,' so that we do not inadvertently share members' emails.

4.7. 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 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 will 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 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

7.1. You have rights under the UK 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. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

www.ico.org.uk

0303 123 1113

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

7.3. For more details, please address any questions, comments and requests regarding our data processing practices to us at Holy Loch Sailing Club, Sandbank, Dunoon, PA23 8QB or email at info@hlsc.co.uk.

8. Review Date

8.1. Review by December 2027.