



The Poole Yacht Club – General Data Protection Regulation (UK GDPR) Policy

Our Commitment

The Poole Yacht Club is committed to the protection of all personal and sensitive data it holds. All data will be handled responsibly and in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

We will monitor and implement any changes to UK data protection legislation to remain compliant with all requirements.

The legal bases for processing personal data are as follows:

- a) **Consent** – the member has given clear consent for the Club to process their personal data for a specific purpose.
- b) **Contract** – processing is necessary to perform an employment contract or membership contract.
- c) **Legal obligation** – processing is necessary for the Club to comply with the law (not including contractual obligations).

The **Poole Yacht Club** is the Data Controller. The **General Manager** acts as the Data Protection Lead, responsible for ensuring compliance. However, all Club staff, contractors, and volunteers must treat all member information in a confidential manner and follow the guidelines in this document.

The Club is also committed to ensuring that staff are aware of data protection responsibilities, receive appropriate training, and comply with this policy.

This policy is mandatory for all staff employed by the Club and any third party contracted to provide services within the Club.

Notification

Where required, the Club's data processing activities will be registered with the **Information Commissioner's Office (ICO)** as a recognised Data Controller. Details are available from the ICO: [ICO Register of Data Controllers](#).

Any changes to the type of data processing activities undertaken will be notified to the ICO, and details updated in the register.

Breaches of personal or sensitive data must be reported immediately to the General Manager. The ICO will be notified within 72 hours **where a breach is likely to result in a risk to individuals' rights and freedoms**. Affected individuals will also be notified where the breach poses a high risk to them.

Personal and Sensitive Data

All data under the Club's control shall be identified as **personal**, **sensitive**, or both, to ensure it is handled in compliance with legal requirements and that access does not breach individual rights.

Definitions of personal and sensitive data follow ICO guidance: [ICO Key Definitions](#).

The principles of the UK GDPR shall be applied to all data processed:

- Data shall be processed lawfully, fairly, and transparently.
- Collected only for specified, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Not retained longer than necessary.

The Poole Yacht Club
New Harbour Road West, Hamworthy, Poole, BH15 4AQ
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- Processed in accordance with the rights of individuals.
- Kept secure through appropriate technical and organisational measures.

Individual Rights

Under the UK GDPR, individuals have the following rights:

1. Right to be informed.
2. Right of access.
3. Right to rectification.
4. Right to erasure ("right to be forgotten").
5. Right to restrict processing.
6. Right to data portability.
7. Right to object.
8. Rights related to automated decision-making and profiling.

Fair Processing / Privacy Notice

The Club shall be transparent about the intended processing of personal data and shall communicate these intentions to members and staff via clear and accessible privacy notices.

Privacy notices shall comply with ICO guidance and, where relevant, be written in a form understandable by children.

See: ICO Guidance – Privacy Notices.

Data may be shared with external authorities (e.g., Local Authorities, Poole Harbour Commissioners, Police, Courts, Health Authorities) where legally required or in the best interests of members and staff.

Only the minimum necessary data will be shared.

Any proposed change to the processing of individuals' data shall be notified in advance.

The Club will not disclose information that:

- Would cause serious harm to a member or another person's physical or mental health.
- Would identify another person as the source of information without their consent (unless disclosure is legally required or reasonable in the circumstances).

Data Security

The Club shall assess risks before undertaking data processing and consider the impact on individual privacy.

Security measures will include:

- Physical controls (secure storage of paper files).
- Technical measures (password protection, encryption, secure systems).
- Controlled access (only authorised personnel).

Where data is shared externally, the Club will ensure that organisations demonstrate competence in protecting shared data.

Data Access Requests (Subject Access Requests)

Individuals have the right to request access to their personal data. The Club will respond within **one month** of receiving a written request.

Requests should be made in writing to:

Chas Kirkby,

General Manager

The Poole Yacht Club

New Harbour Road West

Hamworthy, Poole BH15 4AQ

No charge will be applied.

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Data will not be disclosed to third parties without consent unless legally required or in the best interests of members.

Examples include:

- **Police and Courts** – where required for criminal investigations or by court order.
- **Health Authorities** – where necessary for public health.
- **Photographs and Video**
 - Images of members and staff may be captured during Club activities for internal use.
 - External parties (including parents) are not permitted to capture images of members or staff during activities without prior permission.
 - CCTV is in constant operation for Club security and licensing compliance. Images will only be accessed if required for investigation and will be automatically deleted after 30 days.
- **Location of Information and Data**
 - Hard copy records are stored securely in the office.
 - Medical information may be temporarily held by the First Aid Officer during events where immediate access may be required.
 - Sensitive or personal data must not be removed from Club premises without authorisation.
- **Data Retention and Disposal**
 - Personal data shall be retained only for as long as necessary for its purpose or as required by law.
 - Membership records will normally be retained for 6 years after membership ends.
 - Redundant data shall be securely destroyed by approved disposal partners.
 - Disposal of IT assets will comply with ICO guidance: ICO IT Asset Disposal.