

PRIVACY POLICY

I. INTRODUCTION

We are the Thanet Road Club (referred to as “we”, “us” or “our” in this privacy notice) and our current contact details are on our website <http://www.thanetrc.org/> (Website). For the purposes of the GDPR, the TRC is the data controller of the personal data we hold on you.

This policy explains when and why we collect personal information, how we use it and how we keep it secure and your rights in relation to it.

We may collect, use and store your personal data, as described in this Privacy Policy and as described when we collect data from you, including any information you may provide when you become a member of the International and/or national class Associations, through our website, at regattas, on the class forum, on the class Facebook site, in Surveys, when you sign up to our newsletters, express an interest in the class, or take part in a competition, training, social functions or any activity, event or function organized by or relating to the Class or us (**Activities**).

We reserve the right to amend this Privacy Policy from time to time without prior notice. You are advised to check our Website regularly for any amendments.

We will 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).

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at dataprotection@thanetrc.org.

2. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth, gender, membership number.
- **Contact Data** may include your address, email address and telephone numbers, emergency contact details.
- **Transaction Data** may include details about payments between us including membership and event payments by you.

- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include your boat/sail number, membership status, National Class Association, home Club, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

We may also process Aggregated Data from your personal and profile data, for example from Surveys and competition entries but this data does not reveal your identity and as such in itself is not personal data.

We do not collect Special Category Data (previously known as Sensitive Data under previous Data Protection Act)

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms or otherwise engaging in our Activities, or by communicating with us by post, phone, email or otherwise, including when you:
 - Become a member;
 - Create an account on our sites, forum, FaceBook and similar sites;
 - Subscribe to our publications;
 - Take part in Activities; or
 - Give us feedback.
- **Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. Please view our Cookie Policy.
- **Events and shows:** You may provide your data to us or one of the Licensed Manufactures at events and shows. This data is treated securely from the moment of receiving and transferred to our secure online data software during or directly afterwards. Once securely uploaded, your handwritten data is destroyed.
- **Photos, Videos and interviews:** these may be created at events and elsewhere for the Website, Facebook, media and may be released to the Press, YouTube, and other sites and media, and may be used for promotion of the Class, Class events and by Class & event sponsors.

4. USE OF YOUR PERSONAL DATA & PURPOSE

We will only use your personal data as legally permitted. The most common uses of your personal data are:

- Managing members and the Class.
- Managing, planning, carrying out and reporting Activities.
- Managing event entries and reports, including results.

- Liaising with National Associations, World Sailing, National Yachting Associations, Clubs, event Organizing Authorities, Licensed Manufacturers and sponsors.
- Creating a membership Directory.
- Photos, Videos and interviews may be created at events and elsewhere for the Website, and class Facebook pages and may be released to the Press, YouTube, sponsors, Licensed Manufacturers, and other sites and media; some may include your name, sail number and country.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You have the right to withdraw consent to receiving newsletters and other communications at any time by emailing us at dataprotection@thanetrc.org or via the unsubscribe button present at the bottom of every newsletter.

Set out below is a description of ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant. We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at dataprotection@thanetrc.org if you wish to contest any legal ground.

| Purpose/Activity | Type of data | Lawful basis for processing |
|--|---|--|
| To register you and maintain the membership register | To register you as a new member (a) Identity (b) Contact (c) age | Performance of our contract with you & legitimate interests in operating the Association and its activities, and to liaise with related organizations, including National Class Associations and Organizing Authorities |
| To process membership and event payments, fees and charges Collect and recover money owed to us | (a) Identity (b) Contact (c) Transaction (d) Profile (e) Marketing and Communications | (a) Performance of contract with you (b) Necessary for our legitimate interests to recover debts owed to us |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) communications (c) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to communicate with and survey members and interested parties about the Class and our activities |
| To enable you to participate in and to report on Activities | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Performance of contract with you (b) Necessary for our legitimate interests to keep our records updated and to engage members and interested parties about the Class and Activities |

| Purpose/Activity | Type of data | Lawful basis for processing |
|---|--|---|
| To administer and protect the Association and our sites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests for running the Association and Class, provision of administration and IT services, network security, to prevent fraud and in the context of liaising with related entities (b) Necessary to comply with a legal obligation |
| To deliver relevant content and promotional materials to you, media, sponsors, clubs and related entities and measure and understand the effectiveness of our efforts | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests to promote the Class, us and members, Licensed Manufacturers, our sponsors, and to study how to provide improved and effective service, to develop them, to grow our Class and to inform our promotional strategy |
| To use data analytics to improve our website, services, marketing, relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests to define types of users for our services, to keep our site updated and relevant, to develop our Class and to inform our marketing strategy |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests to develop and grow our Class and services |
| Putting on the clubs website and social media pages and using in press releases. | Photos, Video Interviews with individuals name | Participant's consent to use and of individual names with membership & Activity entry. Or fulfilment of contractual interests |

Where relevant, consent may be withdrawn by email to dataprotection@thanetrc.org

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at dataprotection@thanetrc.org. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we communicate as part of Activities. These include World Sailing, National Class Associations, Clubs, Activity Organising Authorities, National Yachting Associations, Licensed Manufacturers, Activity IMSCA and Class sponsors where applicable.

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 as provided in this document or where we are required to do so by law or as set out below.

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 clubs running events). We do this for the purpose of our legitimate interests in operating the Association and its activities and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and they are required not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

You can ask us or third parties to stop sending you messages at any time by following the opt-out links on any newsletter/message sent to you or by emailing us at dataprotection@thanetc.org at any time. Where you opt out of receiving our newsletter, this will not apply to personal data provided to us as a result of membership, survey participation and other means or transactions.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

As an International Class Association with members throughout the world and running events internationally, including outside the European Economic Area (EEA) some processing of personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we contact Associations and members or use certain service providers outside EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where they are based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield, which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, contractual, accounting, tax or reporting requirements. As a general rule we will retain most data for about 7 years. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Regatta results, reports, images, videos and other media will be retained in perpetuity for the purpose of preserving the history of the Class and us.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of or request restriction of processing of your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at dataprotection@thanetrc.org. You may be requested to pay a fee to access your personal data (or to exercise any of the other rights), particularly if your request is clearly unfounded, repetitive, unduly onerous or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the [Cookie Policy](#).

COOKIE POLICY

When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called ‘cookies’. These cookies cannot be used to identify you personally and are used to improve services for you, for example through:

- Letting you navigate between pages efficiently
- Enabling a service to recognise your computer so you don’t have to give the same information during one task
- Recognising that you have already given a username and password so you don’t need to enter it for every web page requested
- Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast

To learn more about cookies, see:

- www.allaboutcookies.org
- www.youronlinechoices.eu
- www.google.com/policies/technologies/cookies/

Users typically have the opportunity to set their browser to accept all or some cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these options, of course, means that personalised services cannot be provided and the user may not be able to take full advantage of all of a website’s features. Refer to your browser’s Help section for specific guidance on how it allows you to manage cookies and how you may delete cookies you wish to remove from your computer. Multiple cookies may be found in a single file depending on which browser you use.

The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide, as follows: Category 1: strictly necessary cookies These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.