



Little Ship Club's commitment to your privacy

Little Ship Club (LSC) is committed to protecting and respecting your privacy rights. This Privacy Notice ("**Notice**") tells you about how LSC will collect certain personal information, the use that LSC will make of the personal information we hold about you, under what circumstances we may share or otherwise use the information and who we may disclose it to.

Who Are We?

This Notice is issued by, and refers to services provided by:

Little Ship Club (a yacht club for sailors, power boaters and non-sailors alike) is primarily focussed on the provision of Royal Yachting Association (RYA)-approved training services, holding sailing-related events and offering social and other sailing-related services to its members.

The Registered Address of Little Ship Club Limited (LSC) is:

Little Ship Club
Bell Wharf Lane
Upper Thames Street
London
EC4R 3TB

LSC is also registered with the Information Commissioner's Office as a Data Controller under Registration Number Z1589388.

Any queries relating to that registration, or regarding this Notice, should be directed in the first instance to:

The Club Secretary on:

Email: clubsecretary@littleshipclub.co.uk or
Phone: 020 7236 7729

What personal data do we collect about you and how do we collect it?

The data we collect, how we will use it and who we will share it with will depend upon a number of factors including, but not limited to whether you are a:

- Prospective member
- current member
- past member
- trainee
- Honorary Port Officer (HPO)
- or other interested 3rd-party

We have endeavoured to provide as much clarity as we can regarding the data collected and the purposes for which it will be used in the summary table at Appendix A to this Notice.

In the vast majority of cases, the data will be collected directly from you as the Data Subject, although some may also be collected indirectly through your use of the LSC website.

Why do we ask for this information?

Little Ship Club aims to make the process of joining and being a member of the club, even on a temporary basis as a trainee, as stress-free and enjoyable as possible. We recognise that there are many facets to this process including, but not limited to:

- providing you with the information you require to choose Little Ship Club as your club of choice
- keeping you informed of club events and administration information
- providing assistance, through our network of Honorary Port Officers, whilst you are sailing independently
- providing training that meets your requirements and those of the Royal Yachting Association

To ensure that each stage is as efficient as possible, we aim to collect the appropriate amount of information required to fulfil the necessary steps. Recognising that your data is important to you, we aim to minimise the amount of data collected whilst ensuring we have enough to complete the task at hand, or to meet our own legal obligations.

The specific purposes for which we ask for you to supply us with your data are outlined in the table at Appendix A to this Notice.

What is the legal basis for processing your data?

Under current regulations, LSC may collect, store, transfer and process data under a number of different legal bases.

In some cases, we need the data to meet legal obligations upon us and to ensure that we are complying with appropriate statutory requirements. In others, we may need to data in order to provide the level of service outlined in the Club Rules / Handbook.

Whatever the case, LSC is committed to conforming to all appropriate Data Privacy Laws, including the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (UKDPA2018) as enacted.

The bases for data collection and processing are explained, in summary, in the table below.

Basis	Description	Example
Performance of a Contract	The data is required in order for the requirements of the contractual agreement between us to be met.	For us to process membership fees.
Legitimate Interest	Where the data will be used to the benefit of either party, without prejudice to the other.	As a Club organisation, for us to inform you of events and support your training requirements. Similarly, to provide boat and

Basis	Description	Example
		contact information in the handbook or membership directory for you to liaise with other Club members.
Vital Interest	Where the data is required to ensure your safety.	It is a legal requirement that we provide a safe environment for you as a Club member. Equally, in the event of an incident at sea, we may provide your details to appropriate authorities / emergency services.
Legal Claim	Where the data is required to support resolution of a legal dispute between the parties.	We hope this will never be the case but your data may be passed to solicitors, or other interested parties, in order to support any claim / defence.
Consent	Where none of the above apply, but we require data to provide a service, or where we are collecting "Special Category" data e.g. in relation to children, we may seek explicit consent to process that data.	There are few circumstances that we would require consent as we aim to minimise data collected and processed. However, for example, if we needed health-related data for a specific type of event, we may ask you to consent to us collecting and passing this data on for that specific purpose.

The legal bases upon which we collect data from you through the membership lifecycle are summarised in the table at Appendix A to this Notice.

What will we do with the information you provide to us?

As required by data protection legislation, LSC has security procedures regarding the storage and disclosure of personal data. In the course of your application process or ongoing membership with us, LSC may engage a number of third parties and may disclose your personal data to these third parties in connection with services provided by them, as outlined in the table at Appendix A to this Notice.

At all times, LSC will ensure that the personal data is processed in accordance with our instructions and in circumstances which require the recipient to observe industry standard security measures in respect of personal data.

LSC may also be under a duty to disclose or share your personal data in order to comply with a legal or regulatory obligation, where such disclosure is required by, for example, the maritime authorities or a court of competent jurisdiction.

LSC will not disclose or transfer personal data about you to third parties for the purposes of marketing.



The personal data that we collect about you will not knowingly be transferred to, and stored at, one or more countries outside the European Economic Area (“**EEA**”), other than to Honorary Port Officers through the inclusion of your membership details in the Club Handbook. However, we cannot guarantee that information sent to us via email, for example, will not pass through third countries as we have no control over the routing of services by service providers (yours or ours).

The third-party suppliers to whom we might transfer your data, for the specific purposes shown only, are provided in the table at Appendix A to this Notice.

How is the information secured?

As mentioned above, LSC takes reasonable care to ensure that your data is protected at all times. To that end, mobile devices including laptops, as well as central electronic storage are subject to strict controls including:

- Encryption and back up of website files and databases every four hours.
- anti-virus software which is updated frequently
- firewall hardware and software is installed to prevent unauthorised access.
- secure access protocols e.g. password protection and administrator privileged controls.

The centralised electronic storage we use is also protected from accidental damage through the implementation of RAID disk management.

How long is the information retained for?

The length of time for which your data will be retained will be dependent on a number of factors, including but not limited to:

- Legislative requirements
- LSC reporting requirements
- Operational requirements (e.g. adhering to appropriate Health and Safety regulations both on land and at sea)

LSC seeks to minimise the time it retains data in line with the requirements of the EU General Data Protection Regulation (GDPR) and maintains a Retention and Disposition Policy in order to achieve this aim.

The data retention periods associated with member data are summarised in the table at Appendix A to this Notice.

Your rights under the EU General Data Protection Regulation

You have the right to access personal data we hold about you and to request rectification or erasure of such personal data, or to request its transfer. LSC has implemented a number of internal policies and processes to support these rights and to ensure that we can meet any requests in line with the requirements of the GDPR. If you wish to invoke any of these rights, you may address your requests to LSC’s Data Protection Officer through the Club Secretary.

Changes to this Notice



LSC reserve the right to change this Notice and any other relevant policies or procedures at any time and, where appropriate, will provide notice to you should this occur. Any changes LSC may make to this Notice will, unless otherwise indicated, apply to any personal data already obtained by LSC before the changes were made and will be effective from the date on which those changes were made, irrespective of whether notification has been given.

Complaints or queries

For the purposes of the data protection legislation, LSC is the data controller. If you have any questions about this Notice, please contact LSC's Data Protection Officer via email through the Club Secretary.

Where you are dissatisfied with any aspect of our handling of your personal data, you have a right to lodge a complaint with the Information Commissioner's Office:

www.ico.org.uk/concerns

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Appendix A – Member Data Collection, Processing and Basis of Processing Summary

Information collected	Purpose	How stored	Legal basis	Retention Period
Name	Information Provision (accounts, AGM, newsletters, handbook, events, updates, general comms)	Paper, club computers, members' computers	Contract	<p>All membership and training related data will be retained for a period of 2 years after cessation of the appropriate contract in order for LSC to meet its legal and operational requirements, as follows:</p> <p>Prospective members: 2 years post submission</p> <p>Members - as long as member</p> <p>Ex-members: 2 years from cessation of membership (non-renewal)</p> <p>HPOs: 2 years post leaving post</p> <p>Visitors to clubhouse or events: 2 years since last visit</p> <p>Trainees: 2 years post-course</p> <p>Venue Customers: 2 years since event</p>
Address	Information (accounts, AGM, newsletters, handbook, events, updates, general comms)	Paper, club computers, members' computers	Contract	
Bank Details	Billing of recurring fees	Paper, club computers	Contract	
Phone Number	Information (accounts, AGM, newsletters, handbook, events, updates, general comms)	Paper, club computers, members' computers	Contract	
Email address	Information (accounts, AGM, newsletters, handbook, events, updates, general comms)	Paper, club computers, members' computers	Legitimate Interest	
Boat related details	Information (accounts, AGM, newsletters, handbook, events, updates, general comms)	Paper, club computers, members' computers	Legitimate Interest	

Information collected	Purpose	How stored	Legal basis	Retention Period
Photographs (Committee members)	Committee: Information to Members	Paper, club computers	Legitimate Interest	
	Members: Magazine and website articles			
Sailing Preferences	Events	Paper, club computers, members' computers	Legitimate Interest	
Sailing Experience	Events, Training, Health and Safety	Paper, club computers, members' computers	Legitimate Interest	