

## ROYAL THAMES YACHT CLUB

### DATA PRIVACY POLICY

Royal Thames Yacht Club Limited and its subsidiaries (together "the Club") stores a variety of personal data, usually as Controller of the data but sometimes as a Processor of the data and is committed to complying with all current Data Protection legislation applicable to the UK. The Club employs less than 250 employees and where possible avoids storing sensitive personal data.

The Club collects, processes and holds personal data for the following **purposes**:

1. Personal data of Members of the Club is collected for the purpose of managing membership of The Club.

*Save as mentioned below, membership data is not shared with any third party. It is used for internal marketing purposes only.*

2. Personal data of Members of the Club consisting of contact details is collected for the purposes of creating directories enabling members to contact each other for Club activities.

*The printing of member directories is handled securely by contracted printers and member directories are not shared with any third party.*

3. Personal data of Members, their guests and of other competitors at sailing and social events managed by the Club is collected for the purpose of managing sailing and social events.

*Such data is not shared with any third party and is used for internal marketing purposes only.*

*Reports, results and photographs of sailing and social events may be publicised in relevant media.*

4. Personal data of Members' guests and of members of reciprocal clubs is collected for the purpose of managing bookings of restaurants and cabins at the Club.

*Such data is not shared with any third party and is used for internal marketing purposes only.*

5. Personal data of customers holding functions at the Club is collected for the purpose of managing the functions.

*Such data is not shared with any third party and is used for internal marketing purposes only.*

6. Personal data on employees is stored so that the Club can manage its business and discharge its responsibilities as employer. The Club acts as the Data Controller in this instance.

*Employee data is only shared as required by law. On leaving employment the Club will continue to hold sufficient data to enable it to discharge its statutory obligations.*

7. Digital image data from the Club's CCTV system is held for the purposes of security and the prevention and detection of crime.

*CCTV data is only shared as required by law or as ordered by law enforcement bodies.*

8. Sensitive personal data is not generally collected.

The **lawful basis** for processing data under 1, 3, 4, 6 and 7 is for the necessary pursuit of the Club's legitimate interests and in performing the Club's contracts with members and reciprocal members.

The **lawful basis** for processing data under 2 is the positive consent of the Members listed.

The **lawful basis** for processing data under 5 is for the performance of the contract with the customer.

**Data storage and Security:** The Club has implemented generally accepted standards of technological and operational security in order to protect personal data. Computerised data is securely hosted on contracted servers within the EU. Other records are kept securely in the Secretariat or in the archive room at the Club.

The Club will inform data subjects promptly in the event of any breach of their personal data which might expose them to serious risk.

The Club retains membership records for heritage purposes.

All data subjects have the **Rights** to access the data concerning themselves, to require rectification if incorrect, and to refuse consent for the collection of sensitive personal data.

Any enquiries, issues or concerns in connection with Data Protection matters should be raised in the first instance with the Chief Executive of the Club (tel: 0207 201 6261, email [chiefexecutive@royalthames.com](mailto:chiefexecutive@royalthames.com) ). Further complaints may be made to the Information Commissioner ( [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) ).