

NFYC Data Protection Policy

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I. Introduction

The North Fambridge Yacht Club is a small sailing and boat club based on the River Crouch at North Fambridge. It was originally founded in 1898 and the modern iteration came into being in 1973. The club focuses on the sailing of yachts and, recently, has begun to encompass dinghy sailing and gig rowing. NFYC is a fairly small club, with a membership that is usually between 125 and 175 people.

The club is run on an entirely voluntary basis, by its members for its members. That, and the club's small size requires its administrative processes to be straightforward and, in comparison to larger clubs and even small commercial concerns, relatively independent of technology. Accordingly, while complying with relevant legislation, the administrative processes and procedures remain quite simple and represent a straightforward evolution of those that were designed many years ago and have been in practice at NFYC ever since. The present day collection, storage and usage of data generally and reasonably reflects the simplicity of those procedures.

This document, the Club's Data Protection Policy, aims to set out, in suitably brief and simple terms, the Club's essential processes, the data that those processes and procedures use, how we keep that data secure and how long we hold it for. It also covers how members can, if they so require, arrange to view the data that the Club holds about them.

II. Data Protection Policy

Reason for the collection, storage and use of Personal Data

1. NFYC collects, stores and uses data that facilitates the reasonably efficient and safe running of the club and club events. The nature of that data, how it is used and how long it is stored appears in the appendices to this document.

Data privacy

2. In normal circumstances NFYC does not, and will not, pass data and information about any individual to any third-party. The only exceptions to that rule are when:
 - 2.1. the club is required by law to divulge specific information
 - 2.2. the club reasonably believes that the safety, health or well-being of one or more people, or the safety and security of a member's property, would be put at risk by not passing conceivably relevant information on to an apparently appropriate and responsible third-party.
3. In no circumstances will NFYC release any personal data to a third-party for the purposes of marketing.

Consent to the general collection, storage and use of personal data

4. Consent is specifically requested from Applicants to and Members of the club for the club to collect, store and use the data to facilitate the reasonably efficient and safe running of the club and club events.
5. If, once requested, such consent is not forthcoming within a reasonable timeframe or is explicitly withheld then:
 - 5.1. Applications are processed no further and any records pertaining to them are destroyed when reasonably practical.
 - 5.2. The Member is deemed to have resigned from the club with immediate effect and the resignation will be processed in accordance with current procedures.
6. Any preference or consent expressed by a member will be deemed in force until either the member notifies the Club, in writing, to the contrary or their membership ceases.
7. When a membership ceases, for whatever reason, any data collected and recorded about the Member before the date their membership ceased will remain on file and be destroyed in accordance with the club's current procedures and data retention policies.

The Members' Yearbook, and consent for the publication therein of personal data

8. The annually produced Member's Yearbook is only distributed to and intended for use by NFYC members. A copy goes to each club member for their personal use, and a further reference copy is kept in the Clubhouse. Some yearbooks are sent or taken abroad (perhaps to areas of the world where personal data is at greater risk of misappropriation and unauthorised exploitation).
9. Each copy of the Members' Yearbook includes a reminder that the information it contains is confidential, personal to the membership and, therefore, should not be passed to anyone outside the club and should be kept safe from unauthorised access, particularly if taken abroad.
10. Consent is specifically requested from Applicants to and Members of the club for the club to distribute certain information to other members in the annually produced Members' Yearbook.

11. If, once requested, such consent is not forthcoming within a reasonable timeframe or is explicitly withheld then:
 - 11.1. The relevant data items will not appear in the next Members' Yearbook to be published.
 - 11.2. Versions of the Members' Yearbook that existed and have been distributed before consent was specifically requested will remain unaltered.
12. Any preference or consent expressed by the member will be deemed in force until such time as the member notifies the club, in writing, to the contrary.

Data Location and Security

13. At all times, the club takes reasonable and practical steps to keep its data secure and safe from unauthorised access, from theft and from loss and damage.
14. The data collected, stored and used by the club is stored using various media.
15. No club data is stored outside the club premises unless it is in the possession and under the protection of an authorised officer of the club.
16. The club's officers share responsibility for the security of club data stored in the club house.
17. Each officer of the club in possession of any item or items of club data stored outside the club premises is personally responsible for the security and protection of that data, irrespective of the medium or media employed for its storage.
18. The club requires that any item of club data stored outside club premises, and therefore in the possession and under the protection of an authorised club officer is, at all times:
 - 18.1. If held in hard-copy form (i.e. on paper):
 - 18.1.1. afforded a reasonable and practical level of physical security from unauthorised access, loss and damage
 - 18.1.2. reasonably and practically protected from accidental physical loss and damage (such as might happen in a major house fire).
 - 18.2. If held in a digital form:
 - 18.2.1. afforded a reasonable and practical level of physical security from unauthorised access, loss and damage
 - 18.2.2. further reasonably protected from unauthorised access, loss and damage by some form of password protection
 - 18.2.3. reasonably and practically protected from accidental physical loss and damage by an appropriate "back-up" regime – ideally, one that will protect the club from total loss of all the equipment on which the data is stored (such as might happen in a major house fire)
 - 18.2.4. on equipment connected all or some of the time to the Internet, further reasonably protected from unauthorised access, loss and damage by the application of appropriate and practical security software.

Viewing the data that the NFYC holds about its members

19. A club member can ask NFYC to see the data that the club holds about them personally at any time. In response to such a request NFYC will use reasonable and practical endeavours to respond promptly but, because the club is run on a voluntary basis and has no permanent staff, it will not be able to guarantee a particular response time.

20. A member wishing to see their personal data should make their request in writing to the Club Secretary. The current holder of that post is listed on the Member's Yearbook and on the club website (www.nfyachtclub.co.uk).

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Event / Process (Nested – Levels 1 to 5)					Info Groups involved	Comment		
1	2	3	4	5				
Initial Application	Request for Application				Applicant Contact			
	Application	Received			Applicant Contact, Applicant Boat, Application			
		Incomplete / Rejected			"			
		Accepted			"			
Selection	Confirmation of Yacht Havens Discount				Haven's Data			
	Consideration and Decision				Applicant Contact, Applicant Boat, Application, Haven's Data			
	Successful Application	Fee Calculation				Applicant Contact, Application		
		Notification				Applicant Contact		
		Payment	Applicant Payment	Cheque		Applicant Contact, Application, Fee Payments	In anticipation of acceptance, an application must be accompanied by a Cheque for the relevant fee.	
			Part Payment				"	
			Failed Payment				"	
	Applicant set-up as Member				Applicant / Member Contact, Applicant / Member Boat, Application			
	Haven's Contribution				Applicant / Member Contact, Applicant / Member Boat, Application, Haven's Data, Fee Payments			
	Inclusion in Directory/Yearbook				Member Contact, Member Boat	Subject to consent with Application (or subsequent written communication)		

A - Processes

		Fob set-up	Member Contact, Fobs		
		Welcome Letter	Member Contact		
		Annual Material Distribution	"		
		Web-site access	"		
	Rejected Application	Notification	Applicant Contact		
		Return of any Fee Payment	Cash	Applicant Contact	
			Cheque	"	
			Bank Xfer	Applicant Contact, Applicant Bank	
		Archive/Removal of Applicant Details	Applicant Contact, Applicant Boat, Applicant Bank		
Annual Renewal	Build Prompt		Member Contact		
	Issue Prompt		Member Contact		
	Renewal	Payment	Cash	Member Contact, Fee Payments, Cash Receipt	
			Cheque	Member Contact, Fee Payments	
			Bank Xfer	"	
		Part Payment		Member Contact	
		Failed Payment		Member Contact	
		Resignation at Renewal (non-renewal)	Acknowledge Resignation		Member Contact
	Removal and archiving of resigning member's details		Member Contact, Member Boat, Member Bank, Signatories		
	Fob Return		Fobs		
Resignation of Member at any other time	Acknowledge Resignation		Member Contact	Removal and archiving of the resigning member's details occur at the end of the membership year.	

A - Processes

	Fob Return		Fobs	
Modification of Member Details (Anything, including data preferences)	Request / Demand Received			
	Acknowledge		Member Contact	Caution regarding time to take effect.
	Action		Member Contact, Member Boat, Member Bank, Signatories, Fobs	Modifications to preferences will not take full effect until the following membership year.
	Confirmation		Member Contact	
Guest in Clubhouse	Sign in Guest book		Guest Book	
Social Events	Invitation		Member Contact / Guest Contact	
	Event Fee Payment	Cash	Member Contact, Cash Receipt	Guest payments are currently against club rules so any payment is made by a member.
		Cheque	Member Contact	
		Bank Xfer	"	
	Event Refund	Cash	Member Contact, Cash Receipt	Guest payments are currently against club rules so any payment is made by a member.
		Cheque	Member Contact	
		Bank Xfer	Member Contact, Member Bank	
	Race Events	Entry		Competitor Contact, Competitor Boat, Race Data
Entry Fee Payment		Cash	Competitor Contact, plus cash receipt	

A - Processes

		Cheque	Competitor Contact		
		Bank Xfer	"		
	Entry Fee Refund	Cash	Competitor Contact, plus cash receipt		
		Cheque	Competitor Contact		
		Bank Xfer	Competitor Contact, Competitor Bank		
	Results		Competitor Boat, Race Data	Race data kept for long time to assist with handicapping etc.	
Yearbook	Creation		Member Contact, Member Boat		
	Distribution		Member Contact		
	Display			Copy In clubhouse for reference but not obviously available to public.	
Request to View Personal Information	Acknowledgement		Member Contact	Set expectations (some or none) about how long we might take to respond to the request.	
	Disclosure		All, as appropriate		
Expenditure	Members	Expense Claims	Claim Check	Member Contact, Member Expense Claim	
			Expense Payments	Cash	Member Contact, Member Expense Claim, Cash Receipt (from claimant)
				Cheque	Member Contact, Member Expense Claim
				Bank Xfer	Member Contact, Member Expense Claim, Member Bank
	Sundry	Request	Member Contact		

	Refunds	Payment	Cash	Member Contact, plus Cash Receipt (from claimant)		
			Cheque	Member Contact		
			Bank Xfer	Member Contact, Member Bank		
	Suppliers	Quotes		Supplier Contact, Supplier History	At least two comparative quotes is the norm	
		Orders		"		
		Invoices		"		
		Payments out	Cash		Supplier Contact, Supplier History	
			Cheque		"	
			Bank Xfer		"	
Refunds in		Claims		"		
		Payments	Cash	"		
	Cheque		"			
	Bank Xfer		Supplier Contact, Supplier History, Supplier Bank			
Clubhouse Hire	Receipt of Request		Hirer Contact, Hire Detail			
	Acknowledge		"			
	Consideration and Decision	Denied	Negative response	"		
		Accepted	Agreement	"	The rules for the third-party's use of the clubhouse.	
			Invoice	Hirer Contact, Hire Detail, Fee Payments	Sometimes there will be a fee. In fact, probably ought to be a fee if only £1 (clarity of liability).	
			Payment	Cash	Hirer Contact, Fee Payments, Cash Receipt	

A - Processes

				Cheque	Hirer Contact, Fee Payments	
				Bank Xfer	"	
			Part payment		Hirer Contact, Hire Detail	
			Failed / Non-payment		"	
		Cancellation	Notification / Confirmation		Hirer Contact, Hire Detail	
			Refund	Cash	Hirer Contact, Fee Payments, Cash Receipt	
				Cheque	Hirer Contact, Fee Payments	
		Bank Xfer		Hirer Contact, Fee Payments, Hirer Bank		
Clubhouse Usage	Entry Listing				Clubhouse Movements	
	Analysis of usage				"	
Lost Fob	Re-allocation				Member Contact, Fobs,	
	Replacement fee	Payment	Cash		Member Contact, Fee Payments, Cash Receipt	
			Cheque		Member Contact, Fee Payments	
			Bank Xfer		"	
			Partial Payment		"	
	Refund replacement fee	Cash		Member Contact, Fee Payments, Cash Receipt		
		Cheque		Member Contact, Fee Payments		
		Bank Xfer		Member Contact, Member Bank, Fee Payments		

B – Information Groups

Info Group	Data Items	Retention from May '18
Applicant Boat	Boat Name Boat Class (make) and Model Boat Length MMSI Number	2 years
Applicant Contact	Name Address Home phone Mobile E-mail Partners Name	2 years
Application	Date of application Proposer Secunder Reasons for joining Type of Application (Single / Joint / Family)	2 years
Cash Receipt	Payment Ref Value	8 years
Clubhouse Movements	Fob Id Date and Time	21 years
Competitor Boat	Boat Name Boat Class (make) and Model <i>Boat Measurement / Handicap Info</i>	21 years
Competitor Contact	Name Address Home phone Mobile E-mail	21 years
Fee Payments	Payment Type (e.g. Initial fee, annual Single member, annual Joint member, etc.) Member Name Date Value	8 years
Fobs	Member Name Fob Id	2 years
Guest Book	Guest Name Date of entry Boat name Home port	21 years
Guest Contact <i>(Cont.)</i>	Name Address Home phone	2 years

B – Information Groups

<i>(Guest Contact, cont.)</i>	Mobile E-mail Accompanied By (Name)	
Haven's Data	Applicant Name New Berthing Agreement (Y / N)	8 years
Hirer Bank	Hirer Name Bank Account Name Bank Account Number Bank Sort Code	8 years
Hirer Contact	Hirer Name Hirer Contact Name Hirer Address Main phone Mobile E-mail	8 years
Hire Detail	Hirer From date /time To date/time Agreed fee Special Conditions	8 years
Member Bank	Member Name Bank Account Name Bank Account Number Bank Sort Code	8 years
Member Boat	Boat Name Boat Class (make) and Model MMSI Number	8 years
Member Contact	Name Address Home phone Mobile E-mail Partners Name Type of Membership Principal Member (Y/N) Date of Joining Data OK in Yearbook (Y/N)	8 years
Member Expense Claim	Member Nature of expense Value Date of claim Claim decision (Accepted, Rejected, Queried) Decision Date	8 years
Race Data	<i>Race Entries and Results, as required</i>	21 years
Signatories <i>(Cont.)</i>	Member Name	

B – Information Groups

<i>(Signatories, Cont.)</i>	Authorised from (date) Authorised to (date) Signature accepted (by bank)date Signature removed (by bank) date	8 years
Supplier Bank	Supplier Business Name Bank Account Name Bank Account Number Bank Sort Code	8 years
Supplier Contact	Supplier Business Name Supplier Contact Name Business Address Business phone Mobile E-mail	8 years
Supplier History	Item Type (quote, order, invoice, payment, refund, etc.) Date Further Detail (as req.)	8 years