Waldringfield Fairway Committee Data Protection Policy

1. Data protection principles

Waldringfield Fairway Committee (WFC) is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

a. processed lawfully, fairly and in a transparent manner in relation to individuals;
b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

a. This policy applies to all personal data processed by WFC
b. For the purposes of the GDPR, the WFC Secretary will be the “controller” of all personal data and takes responsibility for ongoing compliance with this policy.
c. This policy shall be reviewed annually.

3. Lawful, fair and transparent processing

Individuals have the right to access their personal data and any such requests made shall be dealt with in a timely manner.

4. Data minimisation

a. WFC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
b. Some or all of following data is held for each individual:
    i. name and contact details
    ii. details of moored craft (or craft on waiting list)
    iii. date of joining waiting list
    iv. membership of Waldringfield Sailing Club
    v. inheritance request date

Records of invoices and payments received are not regarded as personal data.

5. Accuracy

WFC shall take reasonable steps to ensure personal data is accurate.

6. Archiving / removal

To ensure that personal data is kept for no longer than necessary, the year in which each individual was last in contact with WFC shall be recorded. After 4 years from the last contact, all data regarding the individual shall be deleted.

7. Security

a. WFC shall ensure that personal data is stored securely.
b. Access to personal data shall be limited to personnel who need access. They are the Committee Secretary and the Harbourmaster.
c. When personal data is deleted this should be done safely such that the data is irrecoverable.
d. Appropriate back-up and disaster recovery solutions shall be in place.

8. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, WFC shall promptly assess the risk to people’s rights and take appropriate action.

END OF POLICY