



SAILING FOR THE DISABLED

Manx Registered Charity No. 325

PRIVACY POLICY

Sailing for the Disabled is a Manx Registered Charity that provides sailing experiences for our members.

Sailing for the Disabled ('SFTD') fully supports respecting your right to privacy and in compliance to the Data Protection Act 2018 ('Applied GDPR').

This policy describes how your personal data is used within the Charity, it clearly explains the data we collect, how we collect it, what we do with it and how long we keep it for.

The Policy also informs you of your rights pursuant to the Applied GDPR and how to exercise those rights.

March 2020

Contents

1. About this Policy
2. What information we collect and why
3. How we protect your personal data
4. Who else has access to the information you provide us?
5. How long do we keep your information?
6. Your rights explained
7. The right to object
8. The right not to be subject to automated decision-making including profiling

1. About this Policy

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

1.2 We may collect, use and store your personal data, as described in this Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Privacy Policy from time to time without prior notice. You are advised to check our website: <http://www.sftd-iom.com/> for the most current version.

1.4 We will always comply with the Applied GDPR when dealing with your personal data. Further details on the Applied GDPR can be found at the website for the Isle of Man Information Commissioner: <https://www.inforights.im/> For the purposes of the Applied GDPR, SFTD is the “controller” of all personal data we hold about you.

2. What information we collect and why

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership/subscriptions of SFTD. Keeping in touch with the Member (including by newsletter).	Performing the SFTD contract with the Member. For the purposes of our legitimate interests in operating SFTD.
Emergency contact details	Contacting next of kin in the event of emergency.	Protecting the Member's vital interests and those of their dependants.
Date of birth / age related information	Managing membership categories which are age related.	Performing the SFTD contract with the Member.
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities for each gender.
The Member's name and e-mail address	Creating and managing the SFTD Membership Directory.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.

Bank account details of the member or other person making payment to SFTD	Managing the Member's membership of SFTD, the provision of services and events.	Performing the SFTD contract with the Member.
Name, e-mail address and telephone number of each SFTD Officer	Information published on SFTD website, in SFTD newsletter and other publications, in SFTD marketing materials.	For the purposes of our legitimate interests in operating and promoting SFTD.
Name, e-mail address and telephone number of each SFTD Committee member	Information held securely internally for SFTD operational business.	For the purposes of our legitimate interests in operating and promoting SFTD.
Employees and representatives of suppliers to SFTD	Entering into and managing arrangements with suppliers.	Entering into and performing contracts with suppliers.

3. How we protect your personal data

3.1 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

3.2 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

4. Who else has access to the information you provide us?

4.1 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 where we are required to do so by law, for example, the prevention and detection of crime.

4.2 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 print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Charity 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 we have a contract in place that requires them to keep your information secure and 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.

5. How long do we keep your information?

5.1 We will hold your personal data on our management database (all information is stored on the Isle of Man) for as long as you are a member of SFTD and for as long afterwards as it is in the legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be

able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims

6. Your rights explained

6.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Secretary in writing:

E-mail: secretary@sftd-iom.com

Post: The Secretary
Sailing for the Disabled
Woodvale, Bradda Road
Port Erin
IM9 6QA

Pursuant to the Applied GDPR, the following rights apply:

1. The right to be informed (knowing how we will use your data).

You have the right to be told how we will use your Personal Data – which is set out in Privacy Policy

2. The right of access (being provided with copies of your data).

You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.

3. The right to rectification (changing incorrect information we hold).

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

4. The right to be forgotten (erasure) (requesting deletion of your Personal Data).

In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our management database).

5. The right to restrict processing (limiting how we use your data).

In certain situations, you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.

6. The right to data portability (moving your data in a useable format).

You have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations.

7. The right to object (when we must stop processing your data).

You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.

8. The right not to be subject to automated decision making, including profiling (making a decision solely by automated means without any human involvement).

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. SFTD does not undertake automated decision making or profiling

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Isle of Man Information Commissioner

PO Box 69
Douglas, Isle of Man
IM99 1EQ

Telephone: +44 1624 693260

E-mail: ask@inforights.im

Website: <https://www.inforights.im/>

For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the Isle of Man Information Commissioner's Office (ICO) on individuals' rights

<https://www.inforights.im/individuals/data-protection/your-data-protection-rights/>

under the Applied GDPR (DPA 2018).