

# **Bognor Regis Sailing Club (BRSC) GDPR Policy and Compliance Statement**

Approved by: General Committee

Date approved: November 2025

Review date: November 2026

Responsible Officer: Membership Secretary (Data Protection Lead)

## **1. General Principles**

Bognor Regis Sailing Club (BRSC) is committed to protecting the privacy and security of all personal data that it holds. This policy sets out how the Club collects, uses, stores, shares and disposes of personal data, in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy applies to all club members, officers, volunteers, contractors, and visitors, and all personal data processed by or on behalf of BRSC.

## **2. Data Map**

BRSC maintains a Data Map outlining all data processing activities, the purposes of processing, storage locations, sharing arrangements, and retention periods. A summary of the current data map is included in Appendix A.

## **3. GDPR Compliance Statement**

BRSC acts as the Data Controller for all personal data it collects and uses. The Club complies with the following UK GDPR principles (Article 5):

- Lawfulness, Fairness, and Transparency – Data is processed lawfully, fairly, and transparently.
- Purpose Limitation – Data is collected for specified, legitimate purposes and not further processed in incompatible ways.
- Data Minimisation – Data collected is adequate, relevant, and limited to what is necessary.
- Accuracy – Data is kept accurate and up to date; inaccuracies are corrected without delay.
- Storage Limitation – Data is kept for no longer than necessary for the stated purpose.
- Integrity and Confidentiality – Data is processed securely using appropriate technical and organisational measures.

- Accountability – BRSC can demonstrate compliance with these principles through documentation, procedures, and training.

#### **4. Lawful Bases for Processing**

BRSC processes personal data under the following lawful bases:

- Article 6(1)(a): Consent – where the individual has given clear consent.
- Article 6(1)(b): Contract – where processing is necessary for membership or participation in club activities.
- Article 9(2)(a): Explicit Consent – for special category data.
- Article 9(2)(d): Not-for-profit Exemption – for data processed by not-for-profit membership bodies where disclosure is not made to third parties.

#### **5. Consent**

Consent is obtained through positive opt-in. It is freely given, specific, informed and unambiguous, separate from other terms and conditions, recorded and verifiable, and capable of being withdrawn at any time. For members under 16 years of age, consent must be provided by a person with parental responsibility.

#### **6. Performance of a Contract**

Membership and event participation require the collection of personal data to administer club services. Such data may include name, address, contact details, membership category, and date of birth. Explicit consent is only required for sharing this data outside the club or for purposes beyond membership administration.

#### **7. Securing Personal Data**

Personal data is only accessible to authorised officers or volunteers who need it for club duties. Data is stored securely on password-protected systems (e.g. Google Drive) or encrypted local files. Documents shared by email are password-protected, and data sharing outside the club will only occur in exceptional, justified, and secure circumstances.

#### **8. Individual Rights**

Under UK GDPR, individuals have the following rights: to be informed, to access their personal data (Subject Access Request), to rectification, to erasure, to restrict processing, to data portability, to object, and rights in relation to automated decision-making and profiling. Requests will be responded to within one month and free of charge unless manifestly unfounded or excessive.

## 9. Subject Access Requests (SARs)

Individuals may request a copy of their personal data by contacting the Membership Secretary at brscmembership@gmail.com. Requests will include data held in membership records, email correspondence, and accounts systems, with responses completed within one calendar month.

## 10. Accountability and Governance

BRSC demonstrates compliance by maintaining written records of processing activities, implementing appropriate security measures, conducting regular reviews, providing annual GDPR awareness training, and reviewing this policy annually following the AGM.

## 11. Data Breaches

A personal data breach occurs when data is lost, accessed, or disclosed unlawfully. If a breach is likely to result in a risk to individuals' rights and freedoms, BRSC will notify the Information Commissioner's Office (ICO) within 72 hours, inform affected individuals promptly, and record all breaches in a Data Breach Log.

## 12. Registration

Bognor Regis Sailing Club is registered with the Information Commissioner's Office (ICO) as a data controller.

## 13. Implementation and Access Control

Dedicated club email accounts are used for correspondence involving personal data. Access is restricted to authorised officers, and reviews ensure minimal data retention. Data processing, use, storage, and deletion are reviewed annually.

## 14. Data Retention and Disposal

Data Type	Retention Period	Rationale
Membership, Contractor, and Customer Data	6 years after last contact	HMRC audit requirement
Email correspondence	2 years after inactivity	Operational necessity
Visitor Log	Bi-annual disposal	Security
CCTV footage	1 month	Security

Marketing subscriptions 2 years after last contact or on withdrawal Consent basis

## 15. Training and Review

Each year, a committee meeting (usually the first after the AGM) will review GDPR principles, assess changes, confirm data cleansing for six-year-old data, and identify training needs for officers and volunteers.

## 16. Privacy Notice

Purpose of Processing: Personal data is used solely to administer membership, events, and club activities.

Lawful Basis: Processing is necessary for membership (Article 6(1)(b)) or based on consent (Article 6(1)(a)) for marketing.

Data Sharing: No data is shared outside BRSC without consent.

Retention: Data is retained for up to six years for members, two years for marketing contacts.

Rights: Individuals have rights to access, correct, erase, restrict, or object to processing.

Withdrawal of Consent: Members may withdraw consent or unsubscribe at any time.

Automated Decision-Making: BRSC does not use automated systems.

Complaints: Contact the ICO via [www.ico.org.uk](http://www.ico.org.uk).

Data Controller: Bognor Regis Sailing Club, [brscmembership@gmail.com](mailto:brscmembership@gmail.com).

## Privacy Notice

GDPR Requirements	Bognor Sailing Club Policy
<i>Purpose of the processing and the lawful basis for the processing</i>	Your information will be stored to enable Bognor Sailing Club to provide membership services.
<i>The legitimate interests of the controller or third party, where applicable</i>	(n/a)
<i>Any recipient or categories of recipients of the personal data</i>	Your information will not be shared with third parties

<i>Retention period or criteria used to determine the retention period</i>	<p>Information about members and customers will be retained for a maximum of six years (in line with HMRC tax law) after the last contact with us.</p> <p>Information about email list subscribers will be deleted after two years of inaction/no contact.</p>
<p><i>The existence of each of data subject's rights:</i></p> <ul style="list-style-type: none"> <li>● <i>The right to be informed</i></li> <li>● <i>The right of access</i></li> <li>● <i>The right to rectification</i></li> <li>● <i>The right to erasure</i></li> <li>● <i>The right to restrict processing</i></li> <li>● <i>The right to data portability</i></li> <li>● <i>The right to object</i></li> <li>● <i>Rights in relation to automated decision making and profiling.</i></li> </ul>	<p>Your rights under the GDPR are not affected and you have the right to view your data, correct any error or ask for it to be erased. You can ask for a copy of your records at any time.</p>
<i>The right to withdraw consent at any time, where relevant</i>	<p>You can cancel your membership or opt out of the emailing list at any time.</p>
<i>The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.</i>	<p>Bognor Sailing Club does not use any automated decision-making or profiling technologies.</p>
<i>Identity and contact details of the controller (and where applicable, the controller's representative) and the data protection officer</i>	<p>Your information is managed by the membership secretary who can be contacted at...</p>
<i>The right to lodge a complaint with a supervisory authority</i>	<p>If you wish to complain about the handling of your personal data can make a complaint to the information Commissioner's office (<a href="http://www.ico.org.uk">www.ico.org.uk</a>)</p>

<i>Whether the provision of personal data part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data</i>	If you choose not to provide personal information for us to process, Bognor Sailing Club would be unable to provide membership services for you, or send you emails about upcoming events.
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## Appendix A – Data Map

<b>Bognor Sailing Club Data Map</b>					
	<b>Collection / Creation</b>	<b>Storage</b>	<b>Usage</b>	<b>Sharing/Transfer</b>	<b>Disposal</b>
<b>Data Subject</b>	Members	Excel Spreadsheet (Membership Secretary) Accounts Software (Treasurer)	Sailing Club Activities	None	After 6 Years Inactivity
	Visitors	Visitors Log	Count of non-member visits	None	Bi-Annually
	Contractors	Accounts Software (Treasurer)	Club Finances for payment	None	After 6 Years Inactivity
<b>CCTV</b>	Members	On Site Hard Drive	Security	None	After one month
	Visitors	On Site Hard Drive	Security	None	After one month