

# WSC Privacy Policy

*Maintaining your privacy is really important to us. You entrust us with sensitive information, and we take that responsibility seriously.*

This policy was last updated on **9th Jan 2021** in line with GDPR requirements. It may be updated in the future and we'll post the new version on the club website.

## 1. General Information

This Privacy Policy explains how Weston Sailing Club (WSC) and Sailing Club Manager (the provider of our portal website) collects, stores and uses personal data when you browse [members.weston.org.uk](https://members.weston.org.uk) (aka 'members portal'), use the application, or otherwise provide your personal data to WSC/SCM.

You need to make sure you have obtained any relevant consents or permissions necessary for you to provide/upload any personal data to the WSC/members portal and for it to be used as set out in this policy (e.g. other family member's email details).

Please read this Privacy Policy carefully to understand how we will treat your personal data.

This Privacy Policy should be read together with Sailing Club Manager's own website Privacy Policy available at [www.sailingclubmanager.com](https://www.sailingclubmanager.com)

**Note:** This Privacy Policy does not include the WSC generic club website [weston.org.uk](https://weston.org.uk) as this does not hold any membership or Personally Identifiable Information (PII) for members. Where email addresses are provided on that website (e.g. for further information/enquiries) these are generic club emails, or provided with express consent of the member concerned.

## 2. What information do we collect?

### *Your personal data*

When we say your "personal data", we mean any information that identifies any person, that you provide to us during your membership, upload to the members portal, or that is contained in any other information that you provide to us (or that you authorise a third party to give to us on your behalf).

Your personal data may also be contained in information that we collect about you in connection with your use of the members portal and/or Sailing Club Manager. Any financial data that you enter, that is provided to WSC from your bank, or payment gateway, isn't part of the personal data detailed here, unless it identifies a person. When it comes to your personal data, we comply with our obligations under the General Data Protection Regulation and any other applicable data protection legislation from time to time.

### *Information you provide*

Your personal data includes the information you provide when you log in and set up/update your account, that you authorise someone else to provide, receive our emails, answer questionnaires, surveys, enter sailing events (including Opens/Invitationals), on the members portal. It also includes information you provide when you complete any physical forms which you submit to us (e.g. Event entry forms). It also includes information you upload to your members portal account (e.g. profile photos).

Examples of this personal data include your name, email address(es), telephone number(s), contact names, and any correspondence when you contact us. It could also include details in any invoices or receipts that you are required to settle (if they identify a person).

### *Information SCM collects*

SCM ('they') collect information about our members portal (our) usage to improve their service and to understand trends in order to enhance user/website content. Some of this data may be "personal data", i.e. where it identifies a person.

Here's the information that they collect and how they use it:

- Monitor patterns of usage, such as login dates and volumes of data, so they can understand how people are using Sailing Club Manager to develop and improve their products.
- Monitor patterns of usage so they can tailor any communications they may send WSC or advertising we may receive. For example, they may tailor their Club newsletter with information about product features that we haven't tried yet, instead of features that we use frequently.
- For security reasons and to aid in monitoring patterns of usage, they may log your IP address when you use the portal. This is your computer's individual identification number that is assigned to your computer when connected to the Internet.
- Monitor traffic information when you visit our portal, or read our emails, including things like page visits, email clicks, invoicing, referring sites, and video viewings. They use this information to improve our website, advertising, promotions, and to understand customer behaviour. Please see section 'use of cookies' below regarding Cookies.

### *Information Others Provide to Us*

We may receive information from others that you have authorised and that the third party provides to us. This could include the initial information to enable us to create your portal account e.g. your full name, your email address, and your telephone number.

### *Financial Data*

In addition to your personal data, we will also hold financial data that you enter into the members portal. Examples of your financial data may include your invoices, receipts, and transactions (if enabled).

WSC owns all of the financial data we enter, or you upload, and has absolute control over who has access to it; however it is your role to safeguard your password and account access.

## **3. What do we use for data for?**

### *Providing your personal data to WSC/SCM*

We use your personal data to enable us to register you and provide you with access to the members portal on the Sailing Club Manager website. It will also enable us to contact you by email, fax, post, SMS, social media or telephone where necessary concerning WSC operations, to record your personal preferences, to personalise our services to you (such as by pre-populating fields to make it easier for you to provide information when you return to the members portal or the Sailing Club Manager website). It will also enable us to produce reports we require as part of the club operations we provide, including regulatory reports and/or other management reports.

We may also validate your information (and, in some cases, match it against information that has been collected by a third party, e.g. Facebook) to check that the data we hold about our members/users is accurate, consistent, and current.

Should we be required to use parts of Sailing Club Manager that involve providing your personal and/or financial data to third parties (e.g. if we need to give our accountant/verifier access to our data), then your personal and/or financial data will be shared in a secure way. Such personal and/or financial data may include for example, general, financial and transactional data, and information from your account such as accounting ledger balances, bank transactions, and invoice details. These third parties will use that data in accordance with any consents you have given us, or that you may give to us in the future.

## *Improving Sailing Club Manager*

SCM will also use and analyse your personal data and financial data so that they can administer, support, improve and develop our/their portal, customer service, and the features of the Sailing Club Manager website and Sailing Club Manager generally. They may use third parties to assist us/them in doing these things from time to time, and in those cases may pass on your personal and/or financial data to them. We and SCM will only share your data with third parties that we trust, and where there are assurances in place as to how they will protect the data.

## *Providing Insights*

SCM monitor anonymous, aggregated information about account and financial data so that they can produce insights about club activities. For example, based on an anonymous, aggregate data analysis, they may produce a white paper that reports how membership and participation trends are changing. They may share these insights with their customers, on their blog or other promotional material, use them internally to improve their product and communications, or share with other interested third parties.

**Just to be clear – they will never identify you, or WSC, in such communications or white papers and will never report data in such a way that you could be identified.**

## *Contacting you for Club Purposes*

We may use your personal data to contact you by email, fax, post, SMS, social media and/or telephone to let you know about the club activities and/or third party services, content, offers, or other sailing related matters which may be of interest to you. We may also use your portal data to enable us to tailor these notifications (in order to make sure what we are sending you is relevant). We will only use your data in this way where you have provided consent by providing your contact details, we have legitimate business reasons for doing so, or where we are otherwise entitled by law to do so.

If you would like us to stop providing you with notifications, just contact us using the details below. Please note, this may take a few working days to take effect. To stop receiving emails from the members portal itself (for example, a reminder that your membership subscription is expiring), you can cancel your portal account. **However please note that as SCM is the primary membership and communication tool used by the club this may cause your membership to be reviewed (see WSC Constitution – Termination of membership)**

We may contact you if the specific arrangement we have in place with a third party which impacts you is changing and/or coming to an end and to let you know what will take place next.

## *Cookies*

SCM may further use, or permit selected third parties to use, your personal data to enable them to track and analyse portal traffic and visitor trends, improve your browsing experience, and to personalise and enhance the content and advertising they display. For further details, please see section 'Use of Cookies' below.

## *Legal Requirements*

WSC may use your personal data to comply with any legal obligations to which the club is subject.

We ask you to periodically check that the personal data we store for you is accurate. If you would like to update the personal data we hold about you, please login to your members portal account. If you are having any access issues, please contact [administrator@weston.org.uk](mailto:administrator@weston.org.uk).

## **4. Why do we use your personal data?**

We collect and use your personal data for a variety of reasons. We need some data to enter into and perform our membership responsibilities for you and provide you with access to the members portal – for example your email contact details and other information requested during the members portal setup process. If you fail to provide such data we will be unable to provide the portal to you.

Other information we collect because we have legitimate business interests, for example, in:

- Ensuring that we can onboard you as a member and manage your portal account;
- Volunteering for and management of roster roles, signing on for racing, entering events;
- Members/operational communication and responding to feedback/questions;
- Improving the club and better understanding how our members use it.

In some circumstances we may need to process your personal data because it is required for compliance with a legal or regulatory obligation.

## 5. Who do SCM share your information with?

SCM will share your personal and account data with third parties in certain circumstances:

- They may disclose your data to their software development partner BoxStuff Ltd as required to provide the portal service and support;
- They may pass aggregate information on the usage of the Sailing Club Manager website and Sailing Club Manager, where relevant, to maintain, improve and manage the Sailing Club Manager website and Sailing Club Manager, but this will not include your personal data.

SCM may also share your personal and financial data with third parties:

- in the event that they, their business, or substantially all of its assets are acquired by a third party (in which case personal information about customers will be one of the transferred assets);
- if they are under a duty to disclose or share your personal or financial data in order to comply with any legal obligation; to cooperate with law enforcement officials in the investigation of unlawful activities of Sailing Club Manager website users or relating to Sailing Club Manager users; or in order to enforce or apply any contract with WSC; or to protect their rights, property, or safety of their employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

SCM also utilise a number of carefully selected third parties to help provide their services to WSC/you.

Examples of these functions include email, providing marketing assistance and data analysis, data management, handling credit card transactions (if enabled) and providing customer service. In choosing to work with any such third parties, SCM will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements they themselves impose and expect, as a minimum. No ownership rights to the WSC data will be transferred to any third party.

The data that we/SCM collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA, who work for SCM, one of their group companies, or for one of their suppliers. Such staff maybe engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your data, you agree to this transfer, storing or processing. SCM will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

For a full list of sub processors and details of the adequate safeguards in place in respect of data transfers outside the EEA, please see [here](#).

## 6. How long do we store your data for?

We only store your data for as long as necessary for the purposes of processing set out in this policy.

When you cancel your membership with WSC, you can either delete your portal access immediately, or we will delete your portal access as soon as reasonably possible (or the end of the membership year).

To ensure the integrity of our systems and your data, SCM utilise various technologies to take secure, encrypted backups. Data remains archived within these backups and these are maintained according to SCM's defined two-year data retention policy, after which they are removed.

## 7. What are your rights?

- 7.1. **Access to your personal data:** You can ask us to confirm if we are processing your personal data and you may request a copy of your personal data by contacting [join@weston.org.uk](mailto:join@weston.org.uk)
- 7.2. **Right to change or withdraw your consent:** Where you have given us consent to make use of your personal data for any of the purposes outlined in this policy, you may withdraw that consent by contacting us. You can manage your own contact preferences via the members portal and/or suppress communications, but please contact us if you need to discuss the implication on your membership of WSC of doing this.
- 7.3. **Right to Rectification:** You may ask us to update out of date or inaccurate information we hold about you. To do so, please log on to your members portal account and update your information or by contacting [join@weston.org.uk](mailto:join@weston.org.uk)
- 7.4. **Right to Erasure:** In certain circumstances you may ask us to erase your Personal Data. If you would like us to erase the personal data we hold about you, please contact us specifying why you would like us to do so.
- 7.5. **Right to Data Portability:** In certain circumstances you may ask us to provide you with the personal data that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such personal data to another data controller.
- 7.6. **Right to object:** In certain circumstances you may object to our processing of your personal data.
- 7.7. **Right to restrict processing:** You can ask us to restrict the processing of personal data we hold about you in certain circumstances by contacting [join@weston.org.uk](mailto:join@weston.org.uk)
- 7.8. **Make a complaint:** You may make a complaint about our data processing activities to a supervisory authority. In the UK this is the Information Commissioner's Office (ICO). Further details can be found on their website at <https://ico.org.uk>.
- 7.9. **Getting in touch:** You can make enquiries and/or to exercise any of your rights in this privacy policy by contacting [join@weston.org.uk](mailto:join@weston.org.uk). Alternatively you may wish to contact the SCM Support Team at [support@SailingClubManager.com](mailto:support@SailingClubManager.com)

## 8. Use of cookies

Cookies are small files saved to your device that track, save, and store information as well as your interactions and usage of SCM services. The primary purpose for our use of their cookies is to allow them to provide a smooth, efficient, and personalised experience for our users through remembering your preferences, storing passwords (if enabled) and serving you more relevant content.

If you want to manage or disable cookies for the website or any other site, you can do it by changing your browser settings. We suggest consulting the Help section of your browser or taking a look at the [About Cookies](#) website which offers guidance for all modern browsers.

For more information about the SCM cookies we use, please see their [Cookie Policy](#).

## 9. Security and data storage

We take security and privacy seriously. We will endeavour to take all reasonable steps to keep your personal and financial data secure once it has been transferred to our systems. SCM adopt appropriate, industry standard data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction.

Where SCM utilise third parties to help provide their services, they will always ensure that the security policies and confidentiality arrangements of those third parties adhere to the same requirements SCM impose and expect, as a minimum.

Where the members portal has allocated you (or where you have chosen) a password which enables you to access certain parts of the WSC members portal website or Sailing Club Manager itself, you are responsible for keeping this password confidential. We ask you not to share your password **with anyone**.

Please note that the internet is not a secure medium and, although we will do our best to protect your data, we cannot guarantee the security of any data transmitted to the Sailing Club Manager website or through Sailing Club Manager itself. Any transmission is at your own risk.

## 10. Changes to this privacy policy

WSC may modify or update this Privacy Policy from time to time to reflect the changes in our operations and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know and update the 'last updated' header at the top of this page.

## 11. Getting in touch

If you have any queries relating to this WSC Privacy Policy or Sailing Club Manager's use of your personal or financial data, please contact us at: [join@weston.org.uk](mailto:join@weston.org.uk)

Alternatively, you can contact the SCM support team at: [support@SailingClubManager.com](mailto:support@SailingClubManager.com) or by writing to them at 6 Marina Walk, Cowes, Isle of Wight, PO31 7XJ, United Kingdom.