

British Finn Association Data Privacy Policy

Policy updated	Version	By	Changes
01/05/2018	V1	Martin Hughes	Initial version of policy published
04/10/2020	V2	Martin Hughes	Para 36 – removed approval 'by you'

General

1. The British Finn Association (BFA) is subject to the General Data Protection Regulation (GDPR) which replaces the old data Protection Act 1998, on May 25th 2018 and for which the BFA is exempt registration.
2. This data privacy policy explains when and why we collect, use, store and keep secure personal data about our members.
3. The BFA Officers may collect, use and store members personal data, as described in this data privacy policy.
4. BFA officers reserve the right to amend this data privacy policy from time to time without prior notice. Members are advised to check the BFA website for amendments
5. BFA officers will always try to comply with GDPR when dealing with members personal data. Further details are published by the Information Commissioner.

Responsibilities

6. The elected officers of the BFA are responsible for publishing and implementing this policy to ensure GDPR is effectively followed.
7. For the Purposes of GDPR:
 - o The Honorary Secretary is the BFA data protection officer.
 - o The Chairman is the data controller.
 - o The membership Secretary and the Chairman are data processors.
 - o Data subjects are past and present members of the Association.
8. The process of adhering to GDPR on a daily basis is the responsibility of all members of the BFA.
9. The data protection officer will highlight to the elected officers of the BFA regarding the implementation of GDPR. Data protection is a standing agenda item for BFA committee meetings.
10. The data controller shall be responsible for and able to demonstrate compliance with the principles of GDPR.
11. The BFA is affiliated to the International Finn Association (IFA) and will share minimal data (results including names, sail numbers etc.) with the IFA.

Holding essential data

12. The BFA will hold minimal essential personal data, both physically and electronically of name, address, contact telephone and email, age grouping, sail number, personal sail number and the banking details of those paying via Webcollect or direct debit.
13. The BFA will retain minimum contact details for identified adults for members under the age of 18yrs.
14. This could include:
 - personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers; date of birth; gender; membership start and end date; records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us; any credit/debit card and other payment details you provide so that we can receive payments from you and details of

the financial transactions with you; use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information; records of your attendance at any events hosted by the BFA or IFA; CCTV footage and other information obtained through electronic; images in video and/or photographic form and voice recordings; details of next of kin, family members, coaches and emergency contacts; records and assessment of any sailor rankings, competition results, details regarding attended and performance; any disciplinary and grievance information; biometric information about you, for example height, weight and physic.

15. The BFA will separately hold on web-based or hard copy the minimum details of all members of the BFA or other national Finn associations for the purpose of running events in conjunction with specific events at specific sailing clubs or locations.
16. The BFA requires to hold minimal contact details of those involved in incidents and accidents including medical details to comply with the expectations of Health and Safety legislation.
17. The BFA will retain member's membership personal data for as long as they are a member of the association and for as long afterwards as necessary to effectively provide a service to members and those who allow memberships to lapse. When members resign from the BF, their personal data will be identified as past member for a period of 5 yrs.(or longer if required by law) to enable leaving members to re-join within that period.
18. BFA officers will securely destroy all financial data once it has been used and is no longer required except where retention is required by law.
19. BFA officers will review past members personal data every year to establish whether the BFA are entitled to retain that data.
20. Privacy notices will be provided to all members setting out the legal basis upon which data is processed e.g. necessary for the delivery of membership and the organisation of events, the purpose for which it is being collected; how it will be used and how long it will be retained.

Membership consent for holding additional data

21. Personal data is a key tool for the BFA in managing its membership.
22. Members are required to provide their consent for the BFA officers to hold additional personal data. Such permissions is provided in the form of an 'opt in' statement within relevant registration and membership forms.
23. If members withdraw their consent for the holding of such additional data then it will be deleted. Such action may mean that member is no longer eligible to participate in some activities.

How the BFA protects personal data

24. The BFA adopt generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. The BFA will notify members promptly in the event of a breach of personal data which might expose members to serious risk.
25. Members are asked to note that the transmission of data over the internet cannot ever be 100% secure.
26. The BFA will recognise and use online secure payments systems for payments made online.
27. Hard copy personal data will be held securely (i.e. under lock and key) either by the data controller or by an association official coordinating an event or function.

28. Soft copy personal data is primarily used for membership information which is backed up within the UK. Any systems used by the BFA will comply with GDPR. Any other software products considered for use in processing personal data will be confirmed compliant with GDPR before adoption.

Publishing of personal data

29. The minimum contact details of class association officials may be published externally such as on the internet to enable them to carry out their duties.
30. Minimum contact details of personnel in clubs or centres hosting BFA events may also have their contact details published for the purpose of that event.
31. The BFA does publish minimal details (name sail number etc.) of members who compete in events as part of the results and event management systems. The publication of such materials is to promote Finn racing and will be done in the legitimate interests of the BFA and its members.
32. Those publishing personal data will seek written consent before publication.
33. The BFA will never sell members personal data.
34. The BFA will not share personal data with third parties without prior consent (which members are free to withhold) except where required to do so by law or as set out in the tables below or when said provision is a condition of the BFA providing a service or holding an event.
35. The BFA may pass personal data to third parties who deliver a service on behalf of the BFA who for the purpose of completing services to members. However, The BFA will disclose only the personal data that is necessary for the third party to deliver a service and where the BFA has a contract in place that requires them to keep BFA provided material secure and not to use it for their own purposes.

Disclosure of your personal information

36. We share personal information with the following parties:
 - any party approved for the purposes of event management
 - to international sailing bodies governing the BFA: to allow them to properly administer the sports on a local, regional and national level
 - specific service providers: for example, email marketing specialists, payment processors, data analysis CCTV contractors, contractors or suppliers and IT services;
 - event organisers and sub-contractors, such as couriers, import/export agents, shippers when organising events;
 - our commercial partners: for the purposes of providing you with information on any special offers, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership package where you have given your express for us to do so;
 - the government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
 - Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.
37. The personal information we collect may be transferred to and stored by World Sailing the International Olympic Committee and the International Finn Association.

Subject access requests

38. Data subjects (member) may request a listing of their information held being processed concerning themselves only. A member can request a data access request by writing to the Hon Secretary. The data controller should action such requests within a period of 1 month, following a check to confirm the identity of the data subject and that such a request concerns personal data. The BFA may charge if such a request is manifestly unfounded or excessive.

Members rights, complaints and queries

39. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting the BFA Hon Secretary.

40. Members have the following rights under GDPR:

- to access their personal data
- to be provided with information about how their personal data is processed
- to have their personal data corrected
- to have their personal data erased in certain circumstances
- to object to or restrict how their personal data is processed
- to have their personal data transferred to themselves or to another organisation in certain circumstances.

41. Members have the right to make complaints about the BFA processes their personal data to the Information Commissioner www.ico.org.uk/concerns tel: 03031231113

Summary of personal data held by the BFA

42. The following table contains a summary of the personal data held by the BFA together with its purpose and the legal basis for its processing, sensitive personal information (medical conditions) will only be held in exceptional circumstances necessary for the personal safety of the member concerned.

USES MADE OF THE INFORMATION

43. The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Personal information held	Purpose	Legal basis for holding
All contact and membership details, transaction and payment information, records of your interactions with us.	To administer any membership and event management, including dealing with payments	This is necessary to enable us to properly manage and administer your membership contract with us.
Contact details, transaction and payment information. Records of your interactions with us.	To arrange and manage any contracts for the provision of BFA activities.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have as part of your membership with the BFA.
Contact and membership details.	To send you information which is included within your membership benefits package, including details about competitions and	This is necessary to enable us to properly manage and administer your membership contract with us.

	events, offers and benefits associated with membership, any updates on national and international events. Regular Finn associated newsletters.	
Contact details and records of your interactions with us	To answer your queries or complaints	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
All the personal information we collect.	Retention of records	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run the BFA and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in holding personal data' above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
Your usage of our IT systems and online portals.	The security of our IT systems	We have a legitimate interest to ensure that our IT systems are secure.
Records of your attendance at any events or competitions hosted by us.	To conduct data analytics studies to better understand event attendance and trends within the sport of sailing	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
Images in video and/or photographic form.	For the purposes of promoting the association, our events and membership packages.	Where you have given us your explicit consent to do so.
Records of attendance, CCTV footage and other information obtained through electronic means, medical information about your health <i>[biometric information about you, for example fingerprints, retina scans]</i>	To comply with health and safety requirements and to conduct data analytics studies to better understand event attendance and trends within the sport of sailing	<p>We have a legal obligation and a legitimate interest to provide you and other members of our association with a safe environment in which to participate in Finn sailing.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to on 'holding personal data' above.</p>

All contact and membership details, transaction and payment data.	To administer your attendance at any events, competitions, training sessions or programmes you sign up to	This is necessary to enable us to register you on to and properly manage and administer your attendance at any BFA run events.
Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	Where appropriate to support members to arrange for any trip or transportation to and from an event	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to on 'holding personal data' above
Health and medical information	To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments at our events.	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in 'holding personal data' above.
All the personal information we collect	To gather evidence for possible grievance or disciplinary hearings	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary or protest hearings, appeals and adjudications. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in 'holding personal data' above
Name, title, date of birth gender, information about your race or ethnicity and health and medical information	For the purposes of equal opportunities monitoring	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in 'holding personal data' above.
Information about your criminal convictions and offences	To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

	safeguarding requirements	
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44. We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

45. In the event of any query or complaint in connection with the information we hold about you, please email the British Finn Association Honorary Secretary.