



## **ROYAL CRUISING CLUB PRIVACY & DATA PROTECTION POLICY**

The Royal Cruising Club's prime objective is the furtherance of cruising under sail for its membership, which is by invitation only and limited to four hundred members, who are expected to contribute to the enjoyment and safety of others by writing accounts of their cruises for the Club Journal and publishing pilotage information.

In order to do this, we need to collect and use personal data, that is information that can identify you, and more generic information, such as your cruising history, that is relevant only to your membership of the RCC. .

The Club is aware of the responsibility placed on it by the Data Protection Act of 1998 as amended for the handling of personal data and individuals' right to privacy. The Hon Secretary and the Hon Webmaster jointly act as data controllers to ensure the provisions of the Act are met. We are confident that all data collected is for specified, explicit and legitimate purposes.

This policy describes what use we make of personal information collected, how it is protected and your right to privacy. This policy covers the following:

- Your consent to this privacy policy
- Information we may collect or receive about you
- Website Cookies
- How we use your information
- How we may share your information
- Retention of your information
- Where we store information about you
- Passwords and PIN numbers
- Use of the Internet
- Your rights and responsibilities
- Access to information
- Changes to our privacy policy
- Contact details

### **Consent to this Privacy Policy**

On first becoming a Member of the RCC you will be asked to give your specific consent to this policy as part of the joining process. Unless otherwise notified, thereafter you will be treated as having consented to our use of your personal data as described in this document.

### **The information we seek to collect**

- a. Your name, gender, post nominals and decorations, date of birth, address, e-mail address, phone number, personal and sailing biography, profession and photograph
- b. The name of your spouse or partner and any relatives in the RCC
- c. Outline details of both your future cruising intentions and past cruises

- d. Accounts of your cruising activities both as journal submissions or as blog entries on the website
- e. Pilotage information submitted through the RCC's CCI scheme
- f. Bank sort code and account number to set up a direct debit for the payment of subscriptions
- g. We receive information about candidates for election from other RCC Members as part of the initial joining process and, in particular, their recommendations as to the candidate's suitability for membership of the RCC. This information is provided in confidence to the RCC's Membership Committee and will not be retained immediately the candidate has been either accepted or rejected for membership.

### **Additional Technical Information we collect about you when you visit any RCC Website or use the RCC Mobile App:**

- a. Technical information, including the Internet protocol (IP) address used to connect your computer or mobile device to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- b. Information about your visit to the Club's website, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; items purchased and the cost of those items including any discounts; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

### **Website Cookies**

RCC Websites use authentication cookies to distinguish you from other users of our website and to ensure that only members can grant access those parts of the site which are designated for members' only use.

### **How we use your information**

We use information held about you:

- a. to administer your membership of RCC and the payment of your annual subscriptions using the Direct Debit Scheme or other methods of payment
- b. To keep you updated in the following ways:
  - to notify you about changes to our membership benefits and conditions
  - to provide you with information about events we run and services we offer to our members
  - to provide you with news and information about other club members in so far as they relate to the objectives of the club
  - to publish contact information and boats owned in the Blue Book for circulation only to other members
- c. We may also use the information we hold about you to post articles about you and your sailing activities in the yachting press or on yachting related websites.

### **How we may share your information**

We may share selected parts of the information you provide us with certain third parties including:

- a. The Royal Cruising Club Pilotage Foundation who may be granted access to any pilotage information you provide unless you indicate otherwise at the time of submission.
- b. Other Cruising Clubs and Associations with whom the RCC shares pilotage and cruising information.
- c. Publishers who publish the Blue Book, cruising pilots and journals for the RCC and RCCPF
- d. The general public who will be able to access cruise reports and certain pilotage information that you provide through the RCC and RCCPF websites.

e. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of RCC and its members.

## **Retention of your information**

We may keep and process your personal data for so long as you remain a member of the RCC. Where your membership lapses, we will within a reasonable time of the lapse occurring cease actively processing your data, but will retain a selected portion of your data for the purpose of the Clubs Official History and Archive. This archive data will include your name, dates of membership, positions held within the Club, boats owned, record of cruises undertaken, prizes and awards won, cruise reports and pilotage information submitted.

We may also retain and process your personal data in a format that does not permit identification of you for statistical purposes.

## **Where we store your personal data**

The electronic data that we collect from you will be stored inside the UK or EEA and processed by staff working for any IT company that the RCC might employ on its behalf to manage its website and membership database. Such staff will be contractually obliged to maintain the privacy of your data and be subject to a data processing agreement with the Club. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## **Passwords**

Where we have given you, or where you have chosen, a password which enables you to access certain parts of any RCC Website or to use any RCC App, you are responsible for keeping this password confidential. We ask you not to share passwords with anyone, and you should not save them in your web browser unless you have specific password protection software on your computer which stores it in an encrypted format. You should change the generic password given you on joining the Club to one of your own choosing at the earliest opportunity.

## **Use of the internet**

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us: any transmission therefore is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access as far as is possible.

## **Your rights**

We will not retain your personal data after you cease to be a member of the RCC except that which would be of historical or statistical interest to future members and researchers but you have the right to ask us to remove even this data if you wish. You can exercise this right at any time by contacting at the Hon Secretary ([honsec@rcc.org.uk](mailto:honsec@rcc.org.uk))

The Club produces and circulates certain publications and you can opt out of receiving these by checking certain boxes on your personal profile on the website, or by contacting the Hon Secretary ([honsec@rcc.org.uk](mailto:honsec@rcc.org.uk)).

The Club also uses bulk emails for the promulgation of news and information and these contain a facility allowing you to unsubscribe from them should you so wish.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Your responsibilities**

With the whole membership having access to other members' personal data there is a risk of accidental disclosure. The onus has to be on members therefore to accept responsibility for the overall security of data stored and to accept the following good practices:

- a. When you log in for the first time, as a new member, you will be required to tick a box (a record of which would be permanently stored against your record on the database) stating that you have read this Policy and agree to comply with it.
- b. You will be prompted automatically to read and re-tick every 12 months
- c. Website passwords should only be saved in a browser if the device itself is password protected and has appropriate anti-virus protection to prevent online theft of these saved credentials.
- d. The members' only section of the website should not be accessed in internet cafes or other publicly available devices in areas where the practice of password theft is possible
- e. Bulk personal data such as the Blue Book pdf or Excel spreadsheets downloaded from the database, should not be sent between members by email without first encrypting and password protecting the files. If doing this the password should always be sent to the recipient in a separate email and preferably by a different means altogether e.g. SMS.
- f. Should you lose a device with Club members' personal data downloaded, or have it stolen, you must immediately inform the Hon Secretary (honsec@rcc.org.uk) so he can assess the risk.
- g. You should guard your copy of the Blue Book, not pass it to anyone outside of the Club and dispose of it in a responsible way to mitigate the threat of exploitation.

## **Access to information**

Data Protection Legislations gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. You can access the vast majority of the information the club holds on you by visiting and updating your personal profile on the RCC website. For any other information you should contact the Hon Secretary (honsec@rcc.org.uk)

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on the RCC website, which you can check at any time, and, where appropriate, notified to you by e-mail.

## **Contact**

Questions and requests regarding this privacy policy should be addressed to the Hon Secretary (honsec@rcc.org.uk).

## **Authorisation**

This policy was authorised by the RCC Committee on 3 May 2017