Data Protection Policy | Wilsonian SC

The Wilsonian Sailing Club (WSC) data protection policy, based on guidance notes from the RYA, is intended to ensure that the minimum personal data for members and guests is obtained to meet the requirements of the club and that such data, however held, is erased as soon as it is no longer required. The details of the data collected and stored, together with the uses of the data, are given below. This policy requires agreement of each member or guest and such agreement may be withdrawn at any time by contacting the club secretary. This is required to meet the 2018 Data Protection Act (itself based on the GDPR) and may require amendment considering GDPR implementation and legal decisions.

Data storage locations:

Content Management System (CMS)

A cloud-based solution hosted by ICUK.NET on secure servers behind firewalls, and controlled access to three datacentres in the UK for resilience and redundancy to store the data attributable to club members.

Access to the data is granted to the webmaster at root level on MySQL servers.

Access to the data is granted to the webmaster at root level on Webservers via FTP.

Access to the data is granted to the members of the committee via the front-end browser.

Data sets are defined as:

- Contacts – Data stored attributable to members personal information.
- Boats – Data stored attributable to members boats.
- Duties – Data stored attributable to members duty dates.
- Events – Data stored attributable to club events as described in the sailing programme.
- Memberships – Data stored attributable to membership information.
- Renewals – Data stored attributable to the renewal of memberships information.
- Requests – Data stored attributable to members requests.
- Website – Data stored attributable to the access of member areas of the website.
- Email – Data stored attributable to the delivery of emails to either generic or group addresses.

Data is encrypted in transit via an annually renewed HTTPS certificate with 'PKCS #1 SHA-256 With RSA Encryption' for the domain name 'wilsoniansc.org.uk'.

Microsoft 365 SharePoint (M365)

A cloud-based solution hosted by MICROSOFT.COM on secure servers to store documents attributable to pertaining to the management of the club.

Access to the documents is granted to the webmaster with global administrator privileges.

Access to the documents is granted to guests (members of the committee) via the front-end browser using Microsoft's proprietary code via their SharePoint Online platform.

Data areas are defined as:

- Committee – Documents shared with read only or read/write permissions to all committee members.
- Secretary - Documents shared with the Honorary Secretary and Flag Officers only.
- Finance - Documents shared with the Honorary Treasurer and Flag Officers only.
- Vault - Documents shared Flag Officers only.
- Archive - Documents shared with the webmaster only.

Data is encrypted in transit via an annually renewed HTTPS certificate with 'PKCS #1 SHA-256 With RSA Encryption' for the domain name '*.sharepoint.com'.

DutyMan System (DMS)

A cloud-based solution hosted by PULSANT.COM on secure servers to store data attributable to club duties.

Access to the data is granted to the members of the committee via the front-end browser to manage the club roster and members.

Access to the data is granted to each member via the front-end browser to manage their own data or view other members personal information.

Data areas are defined as:

- Roster – Data stored attributable to events and aligned members to duties.
- Members - Data stored attributable to members personal information.

Data is encrypted in transit via an annually renewed HTTPS certificate with 'PKCS #1 SHA-256 With RSA Encryption' for the domain name 'dutyman.biz'.

Provisional Membership Forms (PMF)

A paper-based solution hosted at the club premises and stored in the Chief Duty Officer (CDO) cupboard.

Access to the data is granted to club officers and the CDO to process manual membership requests and is stored in the CDO safe.

Data areas are defined as:

- Provisional Membership Form – Data stored attributable to members personal information.
- Provisional Membership Log – Data stored attributable to membership requests.

Training Data Forms (TDF)

A paper-based solution hosted at the club premises and stored in the secure training cupboard in the committee room.

Access to the data is granted to the Training Principal and those members of the training team to manage training events throughout the year.

Data areas are defined as:

- Training Application Form – Data stored attributable to members personal information.
- Completing Questionnaire Form – Data stored attributable to members personal information.

Sailing Sign-On Forms (SSF)

A paper-based solution hosted at the club premises and stored in the race box (for racing) or training cupboard (for training) in the committee room.

Access to the data is granted to the Training Principal and those members of the training team, club officers, CDO, and those on duty to manage races (E.g., Race Officer (RO) and Assistant Race Officer (ARO)).

Data areas are defined as:

- Saturday Skimmers Form – Data stored attributable to members personal information.
- Adult Rookies Form – Data stored attributable to members personal information.
- Race Sign-'On Sheet – Data stored attributable to members personal information.

Racing Results Sheets (RRS)

A paper-based solution hosted at the club premises and stored in the race box (for racing), and a cloud-based solution hosted via the Content Management System (CMS) Platform.

Access to the data is granted to the RO and ARO and those members assigned in compiling race results using the [SailWave](#) application.

The application is not cloud-based and is used to work out event results before exporting web-based files (*.html) that are hosted on the clubs website.

Data areas are defined as:

- Race results – Data stored attributable to members personal information.

Guest Sign-In Data (GSD)

A paper-based solution hosted at the club premises with completed sheets stored in the Chief Duty Officer (CDO) cupboard when the club is closed.

Access to the data is granted to club officers and the CDO to understand what guests are visiting and to what member they are visiting with.

Data areas are defined as:

- Guest Sign-In Sheet – Data stored attributable to members personal information.

Complaints Process Data (CPD)

A paper-based solution hosted at the club premises with completed sheets stored main safe in the committee room.

Access to the data is granted to club officers when a complaint process is in-flight or when historical information needs to be reviewed for subsequent complaints.

Data areas are defined as:

- Complaints Process Log – Data stored attributable to members personal information.
- Complaints Process Form – Data stored attributable to members personal information and complaint details.

In Loco Parentis (ILP)

A paper-based solution hosted at the club premises and stored in the Chief Duty Officer (CDO) cupboard.

Access to the data is granted to club officers when a situation occurs that requires clarification on who has been authorised to act or sign consent on behalf of a junior when the junior's parent/guardian are not available.

Data areas are defined as:

- In Loco Parents Form – Data stored attributable to members personal information.

Personal Identifiable Data (PID) held in storage locations:

		CMS	M365	DMS	PMF	TDF	SSF	RRS	GSD	CPD	ILP
1	First name	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2	Last name	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Date of birth	Yes	Yes	No	Yes	Yes	No	No	No	No	No
4	Address	Yes	Yes	No	Yes	Yes	No	No	Yes	No	No
5	Telephone	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Yes

6	Mobile	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Yes
7	Email	Yes	Yes	Yes	Yes	Yes	No	No	No	No	No
8	Profession	Yes	Yes	No	Yes	No	No	No	No	No	No
9	Guardian By	Yes	Yes	No	Yes	Yes	Yes	No	No	No	No
10	Guardian For	Yes	Yes	No	Yes	Yes	No	No	No	No	No

Personal Identifiable Data (PID) usage

Management of membership	1-7, 9, 10
Classification of membership	3, 4, 9, 10
Management of duties	1, 2, 5-7
Distribution to club members	1, 2, 5, 6
Member expertise	8
Signing-in of guests	1, 2, 4
Management of training	1-7, 9, 10
Signing on to race or train	1, 2, 9
Race results	1, 2
Complaints	1, 2
In Loco Parentis	1, 2, 5, 6

Account Revocation

Within 7 days of the Annual General Meeting (AGM), all officers not voted in are removed from having access to cloud systems.

Within 7 days of the first General Committee Meeting (GCM) following an AGM, all assistant officers not voted in are removed from having access to cloud systems.

Within 7 days of an officer or assistant officer resigning their role, such officer or assistant officer are removed from having access to cloud systems.

Data Retention

Where data is held online or on paper and used for the management of the club, and is not specified in this document, the retention is set as 7 years.

Content Management System (CMS)	7 years
Microsoft 365 SharePoint (M365)	7 years
DutyMan System (DMS)	Removed when no longer eligible for duties
Provisional Membership Forms (PMF)	2 years
Training Data Forms (TDF)	7 years

Sailing Sign-On Forms (SSF)   2 years

Racing Results Sheets (RRS)   20 years

Guest Sign-In Data (GSD)   1 year

In Loco Parentis (ILP)   Destroyed when form expired