

**POLICY**

Waterford Harbour Sailing Club

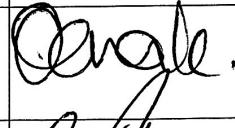
Policy No: Policy 007.03

Policy Title: Data Protection &amp; Privacy Policy

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Effective Date:

12/7/25

**Revision History****Revision 01**

- Initial Draft

**Revision 02**

- Change of Document due to change of Committee Members

**Revision 03**

- Removal of outdated material and updated text and signatures

## Introduction

WHSC ("we", "us", "our") is committed to protecting the privacy and security of your personal data. This Privacy Policy describes how we collect, use, process, and disclose your information, in accordance with the General Data Protection Regulation (GDPR) and other applicable data protection laws. This policy applies to all members of WHSC, including junior and adult members, as well.

WHSC stores any information provided by you in order to provide WHSC services and products. WHSC does not sell, rent, or lease its customer lists to any third parties.

## Collection of Data

We may collect and process the following categories of personal data:

- **Identity data:** name, date of birth, gender, member ID
- **Contact data:** address, phone number, email address
- **Membership data:** membership status, family membership info, sailing qualifications, participation in events or training
- **Financial data:** payment records, invoicing details (note: card payments are processed by third-party providers)
- **Health & safety data:** relevant medical information for training or sailing events, emergency contact details
- **Image data:** photographs or videos from events (with consent where required)

## Legal Bases for Processing

We process personal data under the following lawful bases:

- **Contractual necessity:** to manage membership and club services
- **Legal obligation:** to comply with health, safety, and regulatory requirements
- **Legitimate interests:** for club administration, communications, and promotion
- **Consent:** for optional data uses, e.g., marketing communications or publishing event photos

## How We Use Personal Data

Personal data is used to:

- Administer memberships and renewals
- Organise events, races, and training sessions
- Communicate club updates and newsletters
- Ensure safety and manage incidents

- Maintain historical records and statistics
- Promote the club (e.g., via photos, results)

**Accuracy & Adequacy**

WHSC will take responsible steps to ensure that the data held will be:

- Accurate and complete and, where necessary, kept up to date.
- Adequate, relevant, and not excessive in relation to the purposes for which it was obtained.

**Sharing of Personal Data**

WHSC collects and uses data to operate WHSC and deliver services.

We may share your data with:

- Service providers (e.g., website/email hosting, payment processors)
- Affiliated bodies (e.g., Irish Sailing) for training and event purposes
- Authorities if required by law or for safety (e.g., incident reporting)
- Volunteers and event coordinators under a duty of confidentiality
- Officials of sailing events and associations (for sailor registration and event/race organization)
- Medical professionals (in case of emergencies)

We do not sell or rent personal data to third parties.

**International Data Transfers**

WHSC primarily operates within the Republic of Ireland, however, in some cases, your data may be transferred to, stored, or processed in countries outside the European Economic Area (EEA). In such cases, we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses approved by the European Commission.

**Your Rights and Choices**

Under GDPR, you have the following rights:

Right	Description
Access	Request a copy of your personal data
Rectification	Correct inaccurate or incomplete data
Erasure	Request deletion of your data (in certain circumstances)
Restriction	Limit how we use your data
Portability	Receive your data in a structured, machine-readable format
Object	Object to processing based on legitimate interests
Withdraw Consent	Revoke previously given consent To exercise these rights, please contact us using the details in at the end of this document.

**Retention**

- Retention periods vary depending on data type and legal obligations.
- Data will be kept for no longer than is necessary for the primary purpose for which it was obtained.
- In the case of lapsed members, a facility is provided to unsubscribe from future communications.
- Data will be retained for any period required by law.

**Security**

We have implemented appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction, alteration or other damage or loss. These include:

- Password-protected systems
- Role-based access controls
- Encrypted data transfers (where applicable)

**Processing of Children's Personal Data**

We collect data about children under 18 only with parental or guardian consent and solely for the purpose of participation in club activities such as training courses, coaching and racing.

We take special care when processing personal data of children (individuals under the age of 16) who participate in our club activities. We understand our enhanced obligations under the General Data Protection Regulation (GDPR) regarding children's data and implement appropriate safeguards.

We process children's personal data on the following legal bases:

- Explicit consent from a person holding parental responsibility
- Legal obligation (such as safeguarding requirements)
- Vital interests of the child
- Legitimate interests, where not overridden by the child's fundamental rights and freedoms

For children under 18 years of age, we require verifiable consent from a parent or guardian before collecting and processing personal data. This includes:

- Collecting explicit parental consent for all processing activities
- Verifying that the person providing consent holds parental responsibility
- Maintaining records of parental consent
- Providing mechanisms for parents to withdraw consent at any time

For children we collect only the minimum necessary personal data required to:

- Register children for club and event membership
- Ensure their safety and wellbeing during club activities
- Comply with safeguarding requirements
- Manage club/event/race participation and performance
- Communicate with parents/guardians
- Process emergency medical information where necessary

We respect and uphold children's data protection rights, ensuring:

- Information about data processing is provided in clear, age-appropriate language
- Parents/guardians can exercise data protection rights on behalf of their children
- Children can exercise their own rights where they have sufficient understanding
- Prompt response to any rights requests relating to children's data

**Changes to This Policy**

We may update this Privacy Policy from time to time. If we make significant changes, we will notify you by posting a notice on our website or by sending you an email.

**Contact Us**

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us at:

WHSC, Waterford Harbour, Dunmore East, Co. Waterford.

Email: [info@whsc.ie](mailto:info@whsc.ie)

You also have the right to lodge a complaint with the Irish Data Protection Commission if you believe we have not handled your personal data in accordance with GDPR or other privacy and data protection rights you may have under applicable law. See [www.dataprotection.ie](http://www.dataprotection.ie) for details.