

# Royal Temple Yacht Club Ltd

---

## GDPR & UK Data Protection Policy

### 1. Policy Statement

Royal Temple Yacht Club Ltd (RTYC) is committed to protecting the privacy, security, and rights of all individuals whose personal data we process, including members, employees, volunteers, hotel guests, event attendees, navigation school students, website visitors, contractors, and suppliers.

#### **RTYC complies with:**

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)

### 2. Data Controller

RTYC acts as the Data Controller for personal data processed through:

- Membership administration
- Hospitality and hotel bookings
- Event management
- Navigation school operations
- Employee administration
- CCTV and security systems
- Website and online communications

#### **Contact:**

Royal Temple Yacht Club, Ramsgate, Kent

Email: [info@rtyc.com](mailto:info@rtyc.com) Website: [www.rtyc.com](http://www.rtyc.com)

### 3. Data Protection Principles

RTYC processes personal data in accordance with:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

### 4. Lawful Bases for Processing

RTYC processes personal data under:

- Contractual necessity
- Legal obligation
- Legitimate interests
- Consent
- Vital interests (safeguarding/emergency situations)

### 5. Categories of Data Collected

#### **Members:**

- Personal and contact details
- Payment information

- Boat ownership and membership records
- Emergency contacts

**Hotel Guests:**

- Booking details
- Payment records
- Contact details

**Navigation School:**

- Training records
- Certifications
- Emergency and safeguarding information

**Staff:**

- Employment records
- Payroll
- Compliance documentation

**Website:**

- Cookies
- Online forms
- Marketing preferences

## **6. Special Category Data**

Where necessary, RTYC may process:

- Medical declarations

- Disability access requirements
- Safeguarding disclosures
- DBS documentation

Enhanced protections apply to such data.

## **7. Data Security Measures**

RTYC maintains:

- Password-protected systems
- Access restrictions
- Secure payment systems
- Locked physical storage
- Secure backups
- Cybersecurity controls
- Confidentiality obligations

## **8. Data Retention**

Standard retention periods:

- Membership records: 7 years
- Financial records: 7 years
- Employment records: 6 years post-employment
- Hotel guest records: 3 years
- CCTV footage: 30–90 days
- Incident and safeguarding records: As legally required



## 9. Data Sharing

### **RTYC may share data with:**

- Payment providers
- Booking platforms
- HMRC
- Insurance providers
- RYA and governing bodies
- Legal authorities
- Professional advisers

RTYC does not sell personal data.

## 10. Individual Rights

Individuals have rights to:

- Access
- Rectification
- Erasure
- Restriction
- Portability
- Objection
- Withdraw consent

## **11. Subject Access Requests**

RTYC will:

- Respond within one month
- Verify identity
- Provide data securely
- Maintain SAR records

## **12. Data Breach Procedure**

In the event of a breach:

1. Immediate internal reporting
2. Risk assessment
3. ICO notification where required
4. Notification to affected individuals where appropriate
5. Incident logging and review

## **13. Marketing Compliance**

RTYC ensures:

- Consent where required
- Clear opt-out mechanisms
- PECR compliance
- Responsible promotional communications

## **14. CCTV Policy**

CCTV is used for:

- Security
- Crime prevention
- Staff, Visitor and Member safety

Appropriate signage is displayed.

## **15. Website & Cookies**

RTYC website:

- Provides privacy notice
- Uses cookie controls
- Secures online data
- Protects digital transactions

## **16. Staff Responsibilities**

All staff and volunteers must:

- Protect confidentiality
- Complete relevant training
- Report breaches
- Follow secure procedures

## **17. Committee Responsibilities**

The General Committee is responsible for:

- Policy approval
- Annual review
- Compliance oversight
- Risk management

## **18. Data Protection Lead**

RTYC will appoint a designated responsible officer for:

- Compliance
- Data requests
- Breach management
- Policy maintenance

## **19. Policy Review**

This policy shall be reviewed:

- Annually
- Following legislative changes
- After serious incidents
- Following major operational changes

## Supporting Documents

- Privacy Notice
- Cookie Policy
- Subject Access Request Form
- Data Breach Report Form
- Staff Confidentiality Agreement
- Retention Schedule

Approved by: RTYC General Committee

Review Frequency: Annual

Version: 1.0 Dated May 2026