GST LBG

DATA PROCESSING NOTICE

1. About our Data Processing Notice

1.1 This Data Processing Notice explains when and why we collect personal information about our students, instructors, employees, volunteers, and event attendees, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Processing Notice and as described when we collect data from you.

1.3 We reserve the right to amend this Data Processing Notice from time to time without prior notice. You are advised to check our website - www.sailingtrust.org.gg - regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the Data Protection (Bailiwick of Guernsey) Law 2017 ('the Law') when dealing with your personal data. Further details on the Law can be found at the website for The Office of the Data Protection Authority in Guernsey (www.odpa.gg). For the purposes of the Law, we will be the "controller" of all personal data we hold about you.

2. Who are we?

2.1 We are the GST LBG ('GST')(formerly the Guernsey Sailing Trust LBG). We can be contacted at The Boat House, Castle Emplacement, St Peter Port, Guernsey GY1 1AU / Email – info@sailingtrust.org.gg / Tel – 01481 710877.

3. What information we collect and why.

Type of information	Processing Activity	Legal basis of processing
The Student's name, address, telephone numbers, e-mail address(es) and any relevant medical condition.	Managing the Student's course booking with the GST.	Performing the GST's contract with the Student. For the purposes of our legitimate interests in operating the GST.
The Student's emergency contact details.	Contacting next of kin in the event of emergency.	Protecting the Student's vital interests.
The Student's date of birth/age related information.	Managing student categories which are age related and issuing age	Performing the GST's contract with the Student.

	related certificates.	
Photos and videos of the Students.	Putting on the GST's website and social media pages, and use in press releases.	Consent. We will seek the Student's or Parent's/Guardian's (if under 18 years of age) consent on their Booking Form and the Student or Parent/Guardian (if under 18 years of age) may withdraw their consent at any time by contacting us by e-mail or letter.
The bank account details of the Student or other person making payment to the GST where a refund payment is due to them by the GST	Managing the Student's provision of services and events.	Performing the GST's contract with the Student.
The Student's name, address, telephone numbers, e-mail address(es) and relevant qualifications and/or experience, whilst a current student and for as long as is necessary to comply with our legal obligations.	Passing to the Guernsey Yacht Club ('GYC') and RYA for them to conduct surveys of Students and former students of the GST. See paragraph 5.3 below.	For the purposes of our legitimate interests in operating the GST and / or the legitimate interests of the GYC as a sailing club, and the RYA in its capacity as the national body for all forms of boating.
The name, e-mail address(es), telephone numbers, address and subscription details of the Friends of the Guernsey Sailing Trust ('FoGST') members.	Managing discounts/offers to the FoGST members.	Offering discounts/offers to the FoGST members.

The Instructor's name, address, telephone numbers, email address(es), and relevant qualifications and/or experience.	Managing instruction at the GST.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to students.
The name, e-mail address(es) and telephone numbers of each Instructor and Employee of the GST.	Information published on GST's website, in GST's newsletter and other publications, in the GST's marketing materials and made available to the RYA, in each case as a point of contact at the GST.	For the purposes of our legitimate interests in operating and promoting the GST.
The name, date of birth, bank account details, tax reference and social security details of each Instructor and Employee of the GST.	Performing the GST's contract with the Instructor or Employee eg. payment of salary, tax, social security.	Performing the GST's contract with the Instructor or Employee.
The Volunteer's name, e-mail address(es), telephone numbers, address (if applicable).	Performing and operating the GST.	For the purposes of our legitimate interests in operating the GST.
The name, e-mail address(es), telephone numbers, address (if applicable) and any necessary relevant information (eg. dietary requirements) of Attendees at the GST fundraising events.	Organising and managing fundraising events.	Organising fundraising events.
The employees and representatives of suppliers to the GST.	Entering into and managing arrangements with suppliers.	Entering into and performing contracts with suppliers.

4. How we protect your personal data

4.1 We will not transfer your personal data outside of an area comprising the EU, the United Kingdom and the Crown Dependencies without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the GST and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

5.3 We may also pass your personal data to the Guernsey Yacht Club ('GYC') or the Royal Yachting Association ('RYA') for the purposes of carrying out surveys when it is in the legitimate interest of the GST and the GYC or the RYA to do so. The GYC or the RYA may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that requires the third party to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a student/customer,

instructor, employee, volunteer or event attendee of the GST and for as long afterwards as it is in the GST's legitimate interest to do so or for as long as is necessary to comply with our legal obligations. After this period we will review your personal data regularly to establish whether we are still entitled to process or hold it. If we decide that we are not entitled to do so, we will stop processing or holding your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

7.1 You have rights under the Data Protection (Bailiwick of Guernsey) Law 2017:

(a) to information about why personal data is collected from you.

(b) to access your personal data.

(c) to object to processing your personal data for direct marketing purposes.

(d) to object to processing your personal data on grounds of public interest.

(e) to object to processing your personal data for historical or scientific purposes.

(f) to have your personal data corrected.

(g) to have your personal data erased, in certain circumstances.

(h) to restrict how your personal data is processed.

(i) to not be subject to decisions based on automated processing.

(j) to have data portability.

7.2 You have the right to take any complaints about how we process your personal data to The Office of the Data Protection Authority, Block A, Lefebvre Court, Lefebvre Street, St Peter Port, Guernsey GY1 2JP / Email – info@odpa.gg / Tel – 01481 742074.

For more details, please address any questions, comments and requests regarding our data processing practices to The Principal, GST LBG, The Boat House, Castle Emplacement, St Peter Port, Guernsey GY1 1AU / Email – info@sailingtrust.org.gg / Tel – 01481 710877.