

# Cove Head CIC

## DATA PRIVACY POLICY

### 1. About this Policy

- 1.1. This policy explains when and why we collect personal information, 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 Privacy Policy and as described when we collect data from you.
- 1.3. We reserve the right to amend this Data Privacy Policy from time to time without prior notice.
- 1.4. We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

### 2. Who are we?

- 2.1. We are Cove Head CIC, Registered in England, Company No. 12052442.

### 3. What information we collect and why

Type of information	Purposes	Legal basis of processing
Member's name, class of membership, address, telephone numbers, e-mail address(es), boat name and details, mooring number and details	Allocating mooring positions and storage spaces. Managing the Member's membership of the Company. Performing the Company's contract with the Member. Providing access to the Company website.	For the purposes of our legitimate interests in operating the Company.
	Contacting people such as emergency services, river management authorities, family members.	We will seek the Member's consent on their membership application form. The Member may withdraw their consent at any time by contacting us by e-mail or letter.

### 4. How we protect your personal data

- 4.1. We will not transfer your personal data outside the EU without your consent.
- 4.2. We hold your data on an encrypted security device to AES 256 – bit data encryption in XTS mode. 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. We will notify you promptly in the event of any breach of your personal data of which we become aware and 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 required to do so by law or as set out in paragraph 5.2 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 Diving Belle or Plymouth City Council under the terms of our contract with them). However, we disclose only the personal data that is necessary for the third party to deliver the service or comply with our obligations.

## **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 member of the company and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing 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 GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

- <https://ico.org.uk/concerns/>
- 0303 123 1113
- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

For more information, please send any questions, comments and requests regarding our data processing practices to us via our website: <https://chcic.uk/contact-us.html>