

The Norfolk & Suffolk Boating NSBA Ltd

Privacy Policy



1 Context

1.1 Who we are

Norfolk & Suffolk Boating NSBA Ltd ('NSBA') is a Company Limited by Guarantee which represents private users of pleasure boats in Norfolk and Suffolk. It achieves this directly through Membership - or otherwise through membership of clubs, associations or other organisations.

1.2 Introduction

This policy explains when and why we collect personal information about our Members and other individuals, how we use it and keep it secure and your rights in relation to it. We reserve the right to amend this policy from time to time without prior notice. You are advised to check the NSBA website for any amendments: TheGreenBook.org.uk

1.3 Whose data do we hold?

We collect, hold, process and publish data from:

- a) our Members.
- b) Individuals who volunteer or support NSBA in various ways.
- c) Officers of affiliated clubs, associations and other affiliated organisations.
- d) Individuals who are not necessarily Members of NSBA, but who are members of clubs, NSBAs and organisations which are affiliated to NSBA.
- e) Individuals who wish to receive communications from NSBA.
- f) Individuals who wish to purchase merchandise from NSBA.
- g) Advertisers: Individuals and companies who pay for advertisements in the Green Book.

2 Members

2.1 The personal data that we hold

The data about you which we collect, hold, process and/or publish includes contact details:

- a) Title, First and Last name,
- b) Postal address,
- c) Email address,
- d) Phone number.

However, it will also include some of the following:

- e) Category of membership;
- f) The dates of your membership: date of becoming a Member, date of stopping being a Member;
- g) Details of your subscription and associated payment details: date and amount of payment, method of payment, direct debit instructions, bank account details;
- h) details of correspondence sent to you, or received from you;

- i) contact preferences as provided by you;
- j) details of your boat ownership, where provided by you;
- k) membership of a class association;
- l) your gender and date of birth, where provided by you;
- m) your family and spouse/partner details, where provided by you;
- n) your relationships to other members, where provided by you;
- o) information provided by you about your employment and professional activities;
- p) any other information provided by you.

2.2 What we use the data for

We may use data for the following purposes:

- a) Management of your membership subscription.
- b) To record consent to process and/or publish your data and for other purposes, for example the use of photos of you in our publications;
- c) Data screening and cleansing, to check if we have accurate contact details for you;
- d) Publication in the "[Green Book](#)", our annual handbook of information for Broads boating;
- e) Distribution of a regular newsletter;
- f) Mailings relating to news, events, membership, products and NSBA's general activities;
- g) NSBA's market research purposes, e.g. sending you surveys.

2.3 Whom to contact if you have concerns

If you have concerns about the data we hold about you, please contact NSBA at admin@thegreenbook.org.uk.

3 Affiliate Members and Non-members

3.1 Officer(s) of a club, class or organisation affiliated to NSBA

3.1.1 The personal data that we hold

- a) Name, details of your position in the organisation;
- b) Verification from the organisation of your official status;
- c) Contact details: address, email address, phone number;
- d) Details of your organisation's subscription and associated payment details: date and amount of payment, method of payment, direct debit instructions, bank account details.

We may also collect, hold and process information about your organisation, including:

- a) the numbers in the class (not personal data);
- b) The details and nature of the consent that your organisation has provided to NSBA to allow us to collect, hold, process and/or publish data about your organisation's members;
- c) Boat details: number, name, ownership (personal data - see later).

3.1.2 Whom to contact if you have concerns

If you have concerns about the data we hold about you, please contact your organisation or NSBA (admin@thegreenbook.org.uk) depending on the nature of the concern.

3.2 Members of class associations

3.2.1 The personal data that we hold

NSBA publishes the “[Green Book](#)” on an annual basis. This is a hard copy publication which is distributed to individual and affiliated members and can otherwise be bought by members of the public.

Included in the Green Book are the **class lists**. These list:

- a) the name and number of a boat in the class and, where available,
- b) the name of the owner(s).

The class lists are also published on NSBA website and are accessible (only) to individual members of NSBA who have passworded access to these lists.

The class lists are supplied to NSBA by the relevant class association.

The class association also provides NSBA with assurance that consent has been obtained from their members for their data to be provided to NSBA for publication in the Green Book and NSBA website.

3.2.2 Whom to contact if you have concerns

If you have concerns about the data we hold about you, please contact your class association.

3.3 Other Individuals

3.3.1 The personal data that we hold

We collect, hold and process data from individuals who:

- a) are employees of NSBA or otherwise require payment, including via PAYE;
- b) wish to volunteer or otherwise support the activities of NSBA;
- c) purchase the Green Book or other merchandise from NSBA;
- d) wish to receive communications, eg a newsletter from NSBA;
- e) wish to advertise in the Green Book.

The data we hold include:

- a) Name,
- b) Contact details: address, email address, phone number;
- c) Other essential data for HR and employment purposes;
- d) Payment details, date and amount of payment, method of payment, direct debit instructions, bank account details.

3.3.2 Whom to contact if you have concerns

If you have concerns about the data we hold about you, please contact NSBA at admin@thegreenbook.org.uk.

4 Legal basis of processing main types of information

Type of information	Purpose used for	Legal basis of processing
Members		
NSBA Members' name, address, email address, phone number(s)	Managing the Member's membership of NSBA. Regular communications, eg The Green Book, newsletters, events, surveys etc. Maintaining the Register of members.	Performance of contract. Legal obligation: Maintaining the Register of members is required by company law. Purposes of our legitimate interests in operating NSBA.
NSBA Members' date of becoming a member and stopping being a member	Maintaining the Register of members. Voting rights at the AGM and on other occasions.	Legal obligation: Maintaining the Register of members is required by company law. Purposes of our legitimate interests in operating NSBA.
NSBA Members' name, abbreviated address	Publishing in the Green Book and on NSBA website (Members-only access)	Consent. Purposes of our legitimate interests in operating NSBA
Members' boat ownership	Publishing in the Green Book and on NSBA website (Members-only access)	Consent. Purposes of our legitimate interests in operating NSBA
Payment details: Bank account, direct debit etc. of the Member or other person making payment to NSBA	Managing the Member's membership of NSBA.	Performing NSBA's contract with the Member.
Photos and videos of Members and their boats	Publishing in the Green Book and NSBA website, social media pages, newsletter and using in press releases.	Consent.
Management Committee members' name, address, email address, phone number(s)	Managing the operations of NSBA.	Purposes of our legitimate interests in operating NSBA.
Affiliate Members (clubs, associations or other organisations) and their members		
Officers' names and contact details provided by affiliated clubs, associations and other organisations. Verification information from the relevant organisation.	Publishing in the Green Book and on NSBA website. Voting rights at the AGM or on other occasions.	Purposes of our legitimate interests in operating NSBA
Payment details and numbers of members as provided by affiliated clubs, associations and other organisations	Invoicing or otherwise managing the affiliate membership of the club, association or other organisation.	Purposes of our legitimate interests in operating NSBA
Class lists which include names of owners and their boats. Data is supplied to NSBA by the relevant class association.	Publishing in the Green Book and the NSBA website (password access to Members only).	Consent: The class association provides assurance to NSBA that their member has provided consent to share their information with NSBA including for the purposes of publication.

Type of information	Purpose used for	Legal basis of processing
Non-Members		
Individuals who volunteer or who otherwise support the activities of NSBA: name, address, email address, phone number(s)	Managing the operations of NSBA.	Purposes of our legitimate interests in operating NSBA.
Employees or volunteers in receipt of a payment: Bank details and related financial records; HR details including gender, date of birth etc.	Payroll, PAYE and HR. Managing the operations of NSBA.	Legal obligation. Purposes of our legitimate interests in operating NSBA.
Individuals who purchase merchandise from NSBA: name, contact details, payment details etc.	Obtaining payment and supplying the goods purchased.	Performance of Contract.
Advertiser's name, contact details, payment details etc.	Invoicing in relation to advertising in the Green Book. Publication in the Green Book.	Performance of Contract.

4.1 NSBA as Data Controller

The Data Controller is the Norfolk & Suffolk Boating Association Ltd.

NSBA is registered with the ICO.

Please contact NSBA at admin@thegreenbook.org.uk.

4.2 NSBA as Data Processor

NSBA acts as a Data Processor in relation to processing information on Affiliated clubs, associations or other organisations – including the personal data of their members.

Personal data is supplied to NSBA by the relevant organisation.

NSBA receives assurance from the relevant organisation that it has the consent of its members to share their personal data with NSBA for purposes which includes publication in the Green Book and on the NSBA website.

4.3 How we protect your personal data

NSBA will implement appropriate technical and organisational measures to ensure the security of personal data, including:

- Encryption of sensitive data;
- Regular security assessments;
- Staff training on data protection.
- For any payments which we take from you online we will use a recognised online secure payment system.

4.4 How long do we keep your information?

As NSBA is a company limited by guarantee, it is subject to the Companies Act 2006. This includes a requirement for NSBA to maintain a "Register of Members". This requires NSBA to hold the details of Members for 10 years after they ceased to be a member.

Processing data for tax purposes also places minimum periods for which data needs to be retained.

Otherwise, personal data will be retained for the minimum amount of time necessary for the purposes for which it was collected.

4.5 Data breach

In the event of a data breach, NSBA will promptly assess the risk to individuals' rights and freedoms and, where necessary, report the breach to the relevant supervisory authority and affected individuals.

4.6 Who else has access to the information you provide us?

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 paragraph below.

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 the Green Book, newsletters and to send you mailings). We do this for the purpose of our legitimate interests in operating NSBA and for performing our contract with you.

However, we disclose only the personal data 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.

4.7 Data protection principles

NSBA follows the GDPR data protection principles:

- a) Lawfulness, fairness, and transparency.
- b) Purpose limitation – only use personal data for the reasons we collected it, and not for something extra or unrelated.
- c) Data minimisation – limit the amount of personal data we collect to what we need.
- d) Accuracy – the personal details in our records should be accurate and kept up to date.
- e) Storage limitation – only keep personal data for as long as we need it.
- f) Integrity and confidentiality (security) – personal data needs to be kept securely.
- g) Accountability.

4.8 Your rights

You have rights under the GDPR, including:

- a) the right of access,
- b) the right to object,

- c) the right to be informed,
- d) the right to erasure, to be forgotten,
- e) the right to rectification,
- f) the right to restrict processing,
- g) the right to data portability,
- h) the right not to be subject to automated decision-making including profiling.

4.9 Your right to make a complaint

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues.

However, before doing so please make sure that you have first made your complaint to us (admin@thegreenbook.org.uk) or asked us for clarification if there is something you do not understand.

The ICO will expect you to have done this before reviewing your complaint.

[Make a complaint to the ICO](#)

0303 123 1113

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF