

## **Pin Mill Cruising Data Processing Policy**

### **Section A: About this Policy:**

1. This policy explains when and why we collect personal information from our students and instructors, how we use it and how we keep it secure, and your rights in relation to it.
2. We may collect, use and store your personal data, as described in this Data Processing Policy and as described when we collect data from you.
3. We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website [www.pinmillcruising.co.uk](http://www.pinmillcruising.co.uk) regularly for any amendments (amendments will not be made retrospectively).
4. We will always comply with the General Data Protection Regulations (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.

### **Section B: Who are we?**

1. We are **Pin Mill Cruising (PMC)**. We can be contacted at **01473 780510** or [Sara@pinmillcruising.co.uk](mailto:Sara@pinmillcruising.co.uk)

### **Section C: What information we collect and why:-**

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
Names, addresses, email addresses and telephone numbers of students & prospective students.	Answering enquiries & sending course information.	For the purposes of our legitimate interests, to ensure that we can contact and provide details to those requesting RYA & other instruction
Emergency contact details on booking forms	Contacting next of kin in the event of emergency	Protecting the student's vital interests and those of their dependants.
Sailing experience/qualification	To help guide the student to courses suitable for them	To protect the student's vital interest

General fitness declaration	To fulfil RYA requirements & for the safety of students while on a course.	To protect student's vital interests
Detailed medical declaration for sea survival course	To fulfil RYA requirements for sea survival courses, & protect students safety	To protect the students vital interests
Signature declaration of having read terms & conditions	To ensure students understand their contact with PMC	To protect the students vital interest
Details of certificates issues with names & dates	To fulfil RYA requirements & to replace lost certificates where possible	To protect students vital interests
Instructor's name, address, email addresses & phone numbers	Managing instruction at the PMC.	For the purposes of our legitimate interests in ensuring that we can contact those offering RYA & other instruction.
Instructor's name, email addresses & phone numbers	Email and mobile numbers are passed to student so instructors can provide personal support during a course	To protect the students vital interests during their course.
Instructors relevant qualifications & experience	Managing instruction at PMC & to fulfil RYA requirement.	For the purpose of our legitimate interest & to protect the vital interest of the instructor & student.
Bank account details of instructor's	Managing the business of PMC & paying instructor fees	Necessary for the performance of a contract
Names, addresses, email addresses & bank account details of suppliers of goods & services to PMC	Managing the business of PMC in ordering equipment & supplies, & paying invoices	Necessary for the performance of a contract
Bank account details as shown on a cheque used by a student or other person paying PMC	Managing the business of PMC	Performing PMC's contract with the student or other person

#### **Section D: How we protect your personal data**

1. We will not transfer your personal data outside the EEA without your consent.
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.

3. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
4. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
5. For any payments which we take from you online we will use a recognised online secure payment system.

### **Section E: Who else has access to the information you provide us?**

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 the table above or paragraph 2, and 4 below.
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. PMC instructors). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have agreements in place that requires them to keep your information secure and not to use it for their own purposes.
3. We may pass your data to the RYA who may contact students for quality assurance of RYA training, for example in the investigation of a complaint or incident. In these instances the information is used solely for that purpose.
4. We send completed SRC application and report forms to the RYA so the Certificate of Competence can be issued.

### **Section F: How long do we keep your information?**

1. We will hold your personal data on our systems for as long as you are a student of PMC, and for as long afterwards as is necessary to comply with our legal obligations, and for our legitimate interests in managing the RTC, for example: past students may be offered a discount on future courses and thus it is necessary to ascertain whether someone enrolling has been a student in the past.
2. We maintain records of certificates issues to comply with RYA regulations and to help by replacing of lost certificates, if possible.
3. 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.
4. We securely destroy all financial information once no longer required.
5. SRC written test papers are kept for up to 5 years as required by the RYA to comply with MCA requirements.

## **Section G: Your rights**

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

Information Commissioner's Office,  
Wycliffe House, Water lane, Wilmslow,  
Cheshire SK9 SAF

<https://ico.org.uk/concerns/>

Helpline 0303 123 1113.

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Controller, who is the Sara Hopkinson of PMC- contact details are [sara@pinmillcruising.co.uk](mailto:sara@pinmillcruising.co.uk)