



---

## PRIVACY & DATA PROTECTION POLICY

### 1. Purposes

The HROA's purposes are to provide sailing, social and other activities afloat and ashore, and to promote an exchange of information, experience and views amongst like-minded individuals. The HROA also provides support and advice based on many years experience of our involvement with Hallberg-Rassy in Sweden and their UK agents, Transworld Yachts.

In order to do this, the HROA needs to collect and process personal data (information that can uniquely identify you), and more general information, such as your cruising plans, that is relevant only to your membership of the HROA. To further the aims of promoting exchange of information and improving benefits to members, core contact details are published in our on-line Membership Directories and Members Handbook (available to other members only). Your rights in this respect are outlined in paragraph 13.

The data the HROA collects, and how it is used and stored, complies with the directions of the UK Government legislation outlined in the General Data Protection Regulation (GDPR) which is intended to strengthen and unify data protection for all individuals.

We are committed to keeping your data safe and secure, being transparent with you about how we collect and process it, and only using it for the explicit and legitimate purposes specified here.

This policy describes what use we make of personal information collected, how it is protected and your right to privacy. It covers the following:

- Consent to this privacy policy;
- Information the HROA may collect or receive about you;
- Website cookies;
- How HROA uses members' information;
- Associate Members;
- Retention of members' information;
- Where we store information about you;
- Passwords;
- Your responsibilities;
- Your rights;
- Access to information;
- Changes to HROA privacy policy;
- Contact details.

## **2. Consent to this Privacy Policy**

When you join the HROA you will be asked to give your specific consent to this policy as part of the joining process. Thereafter, you will be treated as having consented to our processing your personal data as described in this document. Existing members of the Association have already given this consent.

## **3. The information the HROA may collect or receive:**

### ***Your personal details***

Your name, addresses, e-mail addresses, phone numbers, yacht details, HROA Offices held.

Where you have recorded a co-owner of your yacht as an Associate Member their personal details are processed separately.

Optional information HROA would like to collect:

- Spouse or partner's name;
- Other clubs / associations you belong to;
- Your sailing area and outline details of your future cruising intentions;
- Photographs of yourself and your crew;
- Accounts of your cruising activities as magazine submissions.

We welcome entries on the closed HROA Facebook groups, but confidentiality of this information is entirely your responsibility.

If you have provided any of the above optional information it will only be available to other members in the on-line directories.

### ***Additional Technical Information we collect about you when you visit the HROA Website or use the Mobile App:***

- Technical information, including the Internet Protocol (IP) address used to connect your computer or mobile device to the Internet, and your login information.
- Information about your visits to the HROA website, including any events you have applied for.

## **4. Website cookies**

HROA Websites use authentication cookies to distinguish you from other users of our website and to ensure that only members can gain access to those parts of the site which are designated for members only use.

## **5. How the HROA uses members' information**

We use information held about you:

- To administer your membership of HROA and the payment of your annual subscription. Note: HROA does not hold bank account details. Our Direct Debit payment scheme is managed by GoCardless and they hold bank account details, under the terms of their own Data Protection Policy and controls.
- To keep you updated in the following ways:
  - Changes to our membership benefits and conditions;
  - Information about events we run and services we offer to our members;
  - Member contact information and boats owned in the Members Handbook, for circulation only to other members;
  - The annual HROA Magazine and the Members Handbook.

- The HROA also uses bulk emails for the promulgation of news and information and these contain a facility allowing you to unsubscribe from them should you so wish.

## **6. How we may share your information**

We share the information you provide with:

- Other current members (through the website and printed Members Handbook);
- Publishers of the Members Handbook (content, for printing purposes only, and distribution list) and the HROA magazine (distribution list only);

We do not share your personal information with any other third parties, apart from any duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of HROA and its members.

## **7. Associate Members**

Associate Members have access to the Members Only area of the HROA website, under their own login and can receive their own copies of email communications if they record a separate email address. Associate Members are assumed to have given the same consent as the principal owner of the same yacht, unless otherwise requested.

## **8. Retention of member information**

We keep and process your personal data as long as you remain a member of the HROA.

If you cease to be a member we will, within a reasonable time, stop processing your data, but may retain a selected portion of your data for the purpose of the HROA Official History and Archive. This archive data will include your name, dates of membership, positions held within the Association, boats owned, awards won, cruise reports and posts in our discussion Forums.

We may also retain and process your personal data in a format that does not permit identification of you.

## **9. Where we store personal data**

The electronic data that we collect from you will be stored and protected by Livelcom UK Ltd and processed by Livelcom staff working to manage our website and membership database. Such staff are contractually obliged to maintain the privacy of your data and to meet the GDPR requirements. They are subject to a data processing agreement with the Association. By submitting your personal data, you agree to this transfer, storing or processing. The HROA will take all reasonable steps necessary to ensure that membership data is treated securely and in accordance with this privacy policy.

Paper copies of records, in the form of past editions of the Members Handbook, are held securely by the Membership Secretary for archive purposes. All other copies are disposed of in accordance with this policy (paragraph 11).

## **10. Use of the Internet**

Although the HROA will do its best to protect your personal data, we cannot guarantee the security of your data during transmission to us: any transmission therefore is at your own risk, however where data is transmitted, then industry standard protection and/or encryption is used.

HROA has a closed Facebook user group. HROA have no control of the privacy of any information exchanged via Facebook.

Once the HROA has received your information, we will use procedures and security features to prevent unauthorised access.

The HROA Website may, from time to time, contain links to and from the websites of other selected networks, advertisers and affiliates. If you follow a link to any of these websites we accept no liability for consequences arising from their use.

## **11. Your Responsibilities**

Since each member has access to other members' personal data there is a risk of accidental disclosure. Hence members need to accept responsibility for the overall security of data stored and to accept the following good practices:

- You are responsible for ensuring that the information held about you is accurate and up-to-date. This can be done through the Members Only area of the website, or by contacting the Membership Secretary.
- The content in the Members Only pages of our website is strictly for the personal use of members and may not be used for any other purpose or disclosed to non-members.
- When applying for membership you will be required to tick a box stating that you consent to HROA processing your data as described in this Policy.
- The Members Only section of the website should not be accessed on shared machines (for example, in Internet cafés or on other publicly available devices) where the practice of password theft is possible. If you have to do this, make sure you log out when you have finished, and do not save the password in the browser.
- Bulk personal data such as the Handbook pdf, or Excel spreadsheets (only available to users with special access rights), downloaded from the website are encrypted and password protected. These passwords may not be removed, and the documents may not be sent to third parties, except to those who have a legitimate need to see them. The password must always be sent to the recipient in a separate email or, preferably, by a different means altogether e.g. SMS.
- If you lose control of a device on which HROA members' personal data is stored (eg. It is lost or stolen), you must immediately inform the HROA Webmaster so the risk can be assessed.
- If you have reason to believe that a device on which HROA data has been saved has been compromised (virus infected, hacked etc.) you should inform the HROA Webmaster immediately.
- The printed copy of the Handbook must not be passed to anyone outside of the HROA. It should be kept in a safe place and destroyed in a responsible way (eg by shredding or burning).

## **12. Passwords**

Where the Association has given you, or where you have chosen, a password which enables you to access certain parts of the HROA Website or to use any HROA App, you are responsible for keeping this password confidential. The HROA expects that members do not share passwords with anyone.

Passwords should never be saved and stored on a device (PC, laptop, tablet or smartphone) which is not in itself password protected, or unless you have specific password protection software on your computer which stores them in an encrypted format. They should only be saved in a browser if the device has appropriate anti-virus protection to prevent online theft of these saved credentials.

## **13. Your Rights**

If you cease to be a member of the HROA you have the right to ask us to remove any data we have retained. You can exercise this right at any time by contacting the Membership Secretary.

You have the right to ask us to publish reduced personal data in our membership directories, both online and printed. You can exercise this right by logging onto the Members Only area of the HROA

website and changing the privacy settings on your profile, or by contacting the Membership Secretary. These privacy settings are assumed to apply equally to any Associate Members living at the same address, unless specifically requested otherwise.

#### **14. Access to information**

Data Protection Legislation gives you the right to access information held about you. You can exercise this right in accordance with the Data Protection Act 2018. You can access and amend most of the information the Association holds about you by visiting your personal profile on the HROA website. For other information the Membership Secretary should be contacted.

#### **15. Changes to our privacy policy**

Any changes the HROA makes to our privacy policy in the future will be posted on the HROA website and, where necessary, notified to you by email.

#### **16. Contact Details**

Questions and requests regarding this privacy policy should be addressed to the Data Protection Officer ([dpo@hroa.co.uk](mailto:dpo@hroa.co.uk)).

#### **17. Authorisation**

This policy was authorised by the HROA Committee on 3 March 2018.

#### **18. Review Date**

This policy will be reviewed in Feb 2021.