

# NBT DATA PRIVACY POLICY 2018

## 1. About this Policy

1.1 This policy explains when and why we collect personal information about our members and customers, 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 Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check this policy regularly for any amendments (amendments will not be made retrospectively).

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 The Narrow Boat Trust. We can be contacted via the secretary at [steilsteven@yahoo.co.uk](mailto:steilsteven@yahoo.co.uk)

## 3. What information we collect and why.

Type of Information	Purposes	Legal Basis of Processing
Member's and Customer's name, address, telephone numbers, e-mail address/es.	Managing the Member's membership of the Trust and Customer's orders.	Performing the Trust's contract with the Member and Customer. For the purposes of our legitimate interests in operating the Trust.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Trust	Performing the Trust's contract with the Member.
Member's emergency contact details	Contacting in the event of emergency	Protecting the Member's vital

		interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the Trust's contract with the Member
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
Photos and videos of members and the boats.	Putting on the Trust's website and social media pages and using in press releases. CCTV in use for security and crime prevention.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by e-mail or letter.
The Member's name and e-mail address	Creating and managing the Trust's online Membership Directory	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.
Bank account details of the member and customer or other person making	Managing the Member's and their dependants' membership of the	Performing the Trust's contract with the Member, customer or supplier.

payment to the Trust. Account details of suppliers are also kept for payments by the Trust	Trust, the provision of services,sales and events to customers and others. Also for goods and services supplied to the Trust.	

#### **4. How we protect your personal data**

4.1 We will not transfer your personal data outside the EEA 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.

4.6 Officers of the Trust who hold and use your data; Secretary  
Treasurer ,Membership Secretary, Crewing Coordinator,  
Maintenance Manager.

Customer data is held by the Coal Sales Coordinator, the Treasurer and by boat captains for point of sale purposes.

Boat captains may hold data of crew members medication requirements, medical conditions and next of kin contact number in case of emergency. Such information will only be held for the duration of the particular trip where the crew member takes part.

4.7 The Trust takes no responsibility for any of your personal data you supply to any persons other than those listed above. You share any such data at your own 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 the table above or 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 print newsletters and send you mailings). 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.

## **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 Trust 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/> Tel 0303 123 1113.

Information Commissioner's Office Wycliffe House Water Lane  
Wilmslow Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager, [lionhearts.datatech@gmail.com](mailto:lionhearts.datatech@gmail.com).