

ASTO Data Protection Policy

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our member organisations, trainees and supporters, how we use it, 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 Protection Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our website www.asto.org.uk regularly for any amendments.
- 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). 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 Association of Sail Training Organisations (ASTO). ASTO can be contacted at Unit 10, North Meadow, Royal Clarence Yard, Gosport PO12 1BP, email admin@asto.org.uk or Telephone: 02392 503222.

3. What information we collect and why

Type of information	Purposes	Legal basis of processing
<p>Member organisations' name, address, telephone numbers, e-mail address(es), vessel details, website and social media details.</p>	<p>Managing the membership of ASTO.</p> <p>Managing events.</p> <p>Creating and managing ASTO's online Membership Directory, Directory of vessel operators.</p> <p>Managing race entries and race results.</p> <p>Sharing race results with other members, and providing race results to local and national media.</p> <p>Booking moorings and berth spaces.</p>	<p>Performing ASTO's contract with the Member.</p> <p>For the purposes of our legitimate interests in operating ASTO.</p> <p>Contract Member organisation details appear in the directory as one of the benefits of ASTO membership.</p> <p>Contract. Entering the race requires data to be processed.</p> <p>For the purposes of our legitimate interests in promoting ASTO.</p> <p>For the purposes of the contract with race participants.</p>
<p>The names, dates of birth and gender of trainees and crews taking part in events.</p>	<p>To comply with the age rules of events. To issue age-related prizes.</p>	<p>Consent. Our member organisations or event participants will seek the trainee's consent on their booking form for the event. Each organisation taking part is to confirm consent to ASTO on the crew list. The trainee's consent can be removed at any time by contacting us by e-mail, telephone or in person.</p>

<p>Designated Person Ashore contact details: Name, email, mobile phone number</p>	<p>Contacting next of kin in the event of emergency</p>	<p>Protecting the Crew's vital interests. ASTO will need to be able to contact a Designated Person Ashore (DPA) who in turn will inform families of an emergency/ incident.</p>
<p>Crew emergency contact details/Next of kin details – (these will only be held by ASTO if the vessel taking part does not have a Designated Person Ashore.)</p>	<p>Contacting next of kin in the event of emergency</p>	<p>Protecting the Crew's vital interests. ASTO will need to be able to contact families to inform them of an emergency/ incident. ASTO will only require Next of kin details if there is no DPA.</p>
<p>Photos and videos of crew and their boats</p>	<p>Putting on ASTO's website and social media pages and using in press releases.</p>	<p>Consent. Our member organisations or event participants will seek the trainee's consent on their event booking form. Each organisation taking part to is confirm consent to ASTO on the crew list. The trainee's consent can be removed at any time by contacting us by e-mail, telephone or in person. There is also a facility on the crew list to indicate if a crew member should NOT be photographed.</p>
<p>Bank account details of the member organisation or other person receiving payment from ASTO.</p>	<p>Managing the organisation's membership of ASTO and the provision of bursaries.</p>	<p>Performing ASTO's contract with the Member organisation or legitimate interest with bursary recipients.</p>

Name, address, email address, phone numbers, employment, qualifications and/or experience of bursary recipients or international exchange candidates.	Managing bursaries and exchanges administered by ASTO.	For the purposes of our legitimate interests in ensuring that we can contact those being offered bursaries and exchanges and provide details of applicants and recipients to the bursary allocators.
DBS – A DBS Application form with all fields completed by applicant is sent to ASTO as Umbrella body for onward transmission to the DBS.	The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.	Consent. ASTO acts as umbrella body for many member organisations, checks your DBS application form and forwards to the DBS. You can read how the DBS use your data, and their Privacy Policies here .
Names, email address and member organisation details of volunteers and employees of member organisations.	Entering into and managing arrangements with course providers.	Entering into and performing contracts with suppliers including Educare and RYA Interactive. ASTO has a contract in place with these data processors.

4. How we protect your personal data

- 4.1 The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of the data processors we use i.e. Mailchimp are signed up to the “Privacy Shield”. “Privacy Shield” means the EU-US Privacy Shield and Swiss-U.S. Privacy Shield Framework self-certification program operated by the U.S. Department of Commerce and approved by the European Commission pursuant to Decision C(2016)4176 of 12 July 2016 and by the Swiss Federal Council on January 11, 2017 respectively.
- 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. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.3 We will use a recognised online secure payment system for any payments we take from you online.

4.4 We will notify you promptly in the event of any breach of your personal data 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 we are required to do so by law or as set out in the table above or in the paragraphs 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, send you mailings, access courses, access bursaries and for DBS checks). We do this for the purpose outlined in the table above. 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. 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. Further details are in our Privacy Notice.

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 ASTO, as long afterwards as it is in ASTO's legitimate interest to do so, or for as long 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. Full details are in our Data Retention Policy.

7. Your rights

7.1 You have the right under the GDPR:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- 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, Cheshire

SK9 5AF

Please address any questions, comments and requests regarding our data processing practices to admin@asto.org.uk