

NBHTA Data Privacy Policy

1. About this Policy

1.1 This policy explains when and why we collect personal information about our clients, 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 Privacy Policy.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <http://www.nbharbour.org.uk> for any amendments (but 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). 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 North Berwick Harbour Trust Association (the Trust). We can be contacted at Harbour Master’s Office, 28 Victoria Road, North Berwick, EH39 4JL.

3. What information we collect and why.

In the following table, “client” refers to those who lease (and those who apply to lease) facilities from the Trust

Type of information	Purposes	Legal basis of processing
Client’s name, address, telephone numbers, e-mail address(es).	Managing the allocation of berthing of vessels; dinghy parking; kaya storage; stores; beach huts; ground; and other facilities, and the provision of services	For the purposes of our legitimate interests in operating the trust.
Client’s insurance company	Ensuring that craft, premises, etc are adequately insured	Performing the Trust’s contract with the client
The client’s vessel type, name, dimensions, sail number and category of use	Managing the allocation of vessel berthing / parking / storage / launching	For the purposes of our legitimate interests in operating the trust.
The client’s details of charges and payment	Managing the allocation of vessel berthing / parking / storage / launching	For the purposes of our legitimate interests in operating the trust.
The client’s car registration	Managing the car parking and vessel launching within the harbour area	For the purposes of our legitimate interests in operating the trust.
Individuals directly paid by the trust. NI number, Tax codes, Salary, Bank Details.	Managing salary payments.	To allow management and payment of wages to employees.

4. How we protect your personal data

4.1 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.

4.2 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 For any payments which we take from you online we will use a recognised online secure payment system.

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 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 client 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>

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 secretary@nbharbour.org.uk