

Ocean Cruising Club

Privacy Policy

1. Introduction

Please read the following information carefully.

This privacy policy contains information about what data the OCC collects and stores about you and why. It also tells you who the Club shares this information with, the security mechanisms in place to protect your data, and how to contact the Club if you have a complaint.

The prime objective of the Ocean Cruising Club Ltd ("OCC", the "Club," "we" or "us") is to encourage long distance sailing in small boats. It is a virtual sailing club and provides a range of services to its members.

The OCC collects, uses, and has certain responsibilities for personal information it has about you. When we do this, we are the "controller" of this information for the purposes of the Data Protection Act, General Data Protection Regulation and other applicable data protection laws.

2. Information collected by us

We collect a range of personal information that you provide to us, as shown in the table at the end of this document.

Additional information we collect about you when you visit any OCC website or mobile application comprises:

- technical information, including the internet protocol (IP) address used to connect your computer or mobile device to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through, and from our site (including date and time); pages you viewed or searched for; items purchased and the cost of those items, including any discounts; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We collect the following information from other sources:

- we may receive information about you from other OCC members as part of the initial joining process and, in particular, the sponsor's recommendations as to your suitability for membership of the OCC; this information is provided in confidence to the OCC's General Committee;
- website cookies - OCC websites use authentication cookies to distinguish you from other users of our website, and to ensure that only members can access those parts of the site which are designated for "members' only" use;
- social media - the Club administers a number of Facebook groups that are open only to OCC members; from time to time the Club will carry out an audit of Facebook activity and may therefore identify levels of usage including posting, commenting, and expressions of view; the Club administers an Instagram account and may from

time to time collect information about members' usage; and the Club may in the future administer other social media accounts which will be subject to the same or similar information collection practices.

Third Party Applications

In addition, as part of conducting club business, the Club at times uses third party applications such as "WhatsApp," an internet-based instant-messaging application, sending text messages, images, videos, location data, and audio media messages via the internet, and may in the future use other applications for the same or similar purposes. The Club does not control the data collected and used by third party applications, whether now existing or developed in the future.

Facebook owns "WhatsApp" and therefore owns all your information, where you are, and who you communicate with. This data can be used by Facebook in line with its User and Privacy policies.

Furthermore, the owner of any similar application may own all your information, where you are, who you communicate with, and how the data is used.

The OCC has no control over such third parties' data collection or use of OCC members' data. At any time, members are free to opt out of a "WhatsApp" or any other application the Club may now or in the future use for the same or similar purposes.

3. How we use your personal information

We use your personal information for the following purposes:

- to administer your OCC membership and the payment of your annual subscriptions, using one of the Club's available methods of payment to which you have agreed;
- to keep you updated in the following ways:
 - to notify you about changes to our membership benefits and conditions,
 - to send you notices of Club meetings and proceedings,
 - to provide you with information about events,
 - to provide you with information about services we offer to our members;
- to provide you with news and information about other Club members insofar as they relate to the objectives of the Club;
- to provide you with pilotage and cruising information;
- to send you publications such as the Members Handbook, Flying Fish, and the Newsletter;
- to enable members of the club to connect with each other by publishing member information in the Handbook, and on the "members' only" area of the website and the mobile application;
- to carry out research to improve or introduce services and facilities for members, and for any other purpose consistent with the objectives of the Club.

4. Whether information has to be provided by you, and why?

The personal information which you must provide to enable us to manage and administer your membership of the OCC is shown in the table at the end of this document.

When we collect information from you, we will inform you whether you are required to provide this information to us.

5. Where and what information we publish

Personal information is published in three formats, the distribution of which is restricted to OCC members:

1. Members' area of the Club's website
2. Club mobile application
3. Members Handbook.

The information that we publish is shown in the table at the end of this document.

For reasons of personal security, the Club recognises that limited disclosure of personal information may be required and offers the option to disclose only the following:

- member name, current boat name, date of joining, and qualifying passage information (year, boat name, from, to).

6. Legal reasons we collect and use your personal information

We rely on the following as the legal basis for collecting, retaining, using, and processing your information:

- it is necessary and in the legitimate interests of the OCC in developing, offering, managing, and administering services to and facilities for members, membership fees, Club finances, and in meeting its legal obligations as a Private Company Limited by Guarantee.

7. Who will we share your personal information with?

We may share information you provide us with certain third parties, including:

- confirmation that you are a member, if requested by a reciprocal club or
- discount service provider;
- other cruising clubs and associations with whom the OCC shares pilotage and cruising information;
- the general public, who are able to access Flying Fish articles you have written (note that OCC does not resell articles and the author and photographer retain copyright), any information you provide through OCC online public forums, and cruising location updates;
- posting articles about you and your sailing activities on the publicly accessible section of the OCC website, in online OCC newsletters, and on the OCC's social media feeds and similar online forums;
- posting articles about you and your sailing activities in the yachting press and on yachting-related websites.

We may also disclose your personal information to third parties if we are required or requested to disclose or share your personal data in order to comply with any legal regulatory, or contractual obligation, or to protect the rights, property, or safety of the OCC and its members. Otherwise, the OCC does not share your personal data with third party commercial organisations or sponsors.

8. Transfer of your information outside the European Economic Area (EEA)

Data that we collect from you will be stored inside the UK or EEA and processed by staff working for any IT company that the OCC might employ on its behalf to manage its website and membership database. Such company/staff will be contractually obliged to maintain the privacy of your data and comply with other obligations of data processors. By submitting your personal data, you agree to this transfer, storing or processing.

Your name and address details will be sent to our printers to allow them to distribute the Club's printed communications and publications. Whilst this processing is currently conducted within the UK, the OCC may distribute its print and distribution on a regional basis around the world. By submitting your personal data, you agree to this transfer, storing or processing. If you chose the option to not receive publications via physical mailings your details will be excluded from this process.

Where you have selected the option to receive emails from the club, your name and email address may be transferred to the OCC's chosen bulk email service, ConstantContact. This service is based in the USA and transfers and processing of data are covered under the Privacy Shield arrangements between the European Union and the USA .

The OCC will carry out a Data Protection Impact Assessment where this may be appropriate to protect personal data transferred outside the UK/EEA.

9. Passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts of any OCC website or to use any OCC app, you must make every effort to keep this password confidential. Do not share passwords with anyone, and do not save passwords in your web browser unless you have specific password protection software on your computer which stores them in an encrypted format.

10. How long will we store your personal data?

We will keep and process your personal data for so long as you remain a member of the OCC.

Where your membership ceases, we will, within a reasonable time (up to six months), stop actively processing your data, but will retain your data for two years for Club purposes, including re-joining and statistical analysis.

Thereafter, we will minimise the data we retain in the archive by deleting all your personal data except for the historic details of your membership of the club, including membership number, county/state, country, dates of membership, cumulative years of membership, membership status upon departure (including reason for departure, account balance, and secretary's comments), qualifying and circumnavigation passages, awards received, positions held, forum posts, and cruising reports made (in publications, on the website, or otherwise). This data will be held in archive as part of the historic record of the Club.

11. Consent

We are relying on consent through a number of lawful bases (a contract with you (your membership), compliance with legal obligations, OCC's legitimate interests) to collect, use, and share your personal data as set out in this Policy. Consent was provided when you

joined the OCC, or when you received a notice of changes to the Privacy Policy and accepted the updated Privacy Policy as part of your continued membership of the OCC.

12. Security

The transmission of information via the internet or email is not completely secure. Once we have received your information, we will use all reasonable procedures and security features to try to prevent unauthorised access.

We will take all steps reasonably necessary to ensure that your data are treated securely and in accordance with this Privacy Policy. In conjunction with the Club's data processors, we will implement physical security measures that include firewalls, password protection, database security roles, and backup arrangements which we or our data processors determine appropriate to comply with the Data Protection Act (DPA).

The database and associated user interfaces are designed to comply with current best practice with respect to securing data subject to the DPA.

Whilst the OCC seeks to take reasonable steps to mitigate data security breaches, all risks of access to personal data cannot be eliminated, especially if such data is misused by other members.

13. Future Processing

We do not intend to process your personal information for any reason other than stated within this privacy policy. If this changes, we will inform you via the OCC website and mobile application, and where appropriate, notify you by email.

14. Your Rights

Under the DPA, you have a number of important rights that you may exercise, free of charge. In summary, these rights are:

- transparency over how we use your personal data and fair processing of your information;
- access to your personal information and other supplementary information;
- to require us to correct any mistakes or complete missing information we hold about you;
- to require us to erase your personal information in certain circumstances;
- to receive a copy of the personal information you have provided to us or have this information be sent to a third party; this will be provided to you or the third party in a structured, commonly used, and machine-readable format;
- to object at any time to processing of your personal information for direct marketing;
- to object in certain other situations to the continued processing of your personal information;
- to restrict our processing of your personal information in certain circumstances.
- If you would like more information about your rights under the DPA, please see the Guidance from the Information Commissioner's Office (UK) on individuals' rights under the DPA.

If you would like to exercise any of these rights, you must:

- email us at secretary@oceancruisingclub.org (we may need to contact you to request further information to verify your identity);
- provide proof of your identity and address;

- state the right or rights that you wish to exercise.

We will respond to you within one month from the date we receive your request.

15. How to make a complaint?

We hope that you are content with our services to members. Please get in touch if you have any concerns (see 'Get in touch' below).

The DPA also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live, or where the alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner's Office which may be contacted at <https://ico.org.uk/concerns/>.

16. Changes to this Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on the OCC website and mobile application, and, where appropriate, we will notify you by email. Please check the website or mobile application from time to time for the latest version, and any updates or changes to our Privacy Policy.

17. Get in touch

Questions and requests regarding this Privacy Policy should be addressed to the Secretary, at secretary@oceancruisingclub.org

Personal Information Collected, Required and Published

What we collect	What you must provide	What we publish		
		On the website	On the mobile app	In the Handbook
Surname	✓	✓	✓	✓
Forenames	✓	✓	✓	
Chosen name	✓	✓	✓	✓
Partner name	✓	✓	✓	✓
Title	✓	✓	✓	
Initials	✓	✓	✓	
Post nominals and decorations	✓	✓	✓	
Nationality	✓	✓	✓	
Names of relatives who are OCC members	✓			
Location	✓	✓	✓	✓
- Postal/street address	✓	Published only for POs/PORs	Published only for POs/PORs	Published only for POs/PORs
- Town/city	✓	✓	✓	✓
- County/state	✓	✓	✓	✓
- Country	✓	✓	✓	✓
- Postal/Zip code	✓			
Telephone numbers	✓	✓	✓	✓
Email addresses	✓	✓	✓	✓
Blog or website URLs	✓	✓	✓	
Date of birth	✓			
Photograph		✓	✓	
Vessels owned:	✓	✓	✓	Current Vessel
- name	✓	✓	✓	✓
- type	✓	✓	✓	✓
- LOA	✓	✓	✓	✓
- Call sign		✓	✓	
- MMSI		✓	✓	
- sail no.		✓	✓	
- Home port	✓	✓	✓	
Qualifying passage	✓	✓	✓	✓
- year	✓	✓	✓	✓
- yacht	✓	✓	✓	✓
- from	✓	✓	✓	✓
- to	✓	✓	✓	✓
- distance	✓	✓	✓	
- capacity	✓	✓	✓	
Membership type		✓	✓	
Year joined		✓	✓	✓
Experience		✓	✓	
Future cruising plans		✓	✓	
Other information you wish to share		✓	✓	
Prior OCC membership	✓			
OCC awards received and positions held	✓			
Accounts of your cruising activities as submitted to the Newsletter, Flying Fish and the e-Bulletin and as entries on the OCC Forum				
Preferred method of payment for membership	✓			

