



## Privacy Statement

Your privacy is important to us. The Pilgrim Heritage Sailing Foundation is a registered charity that preserves, operates, maintains and protects the heritage sailing trawler Pilgrim of Brixham BM45. Our registered office and contact details are shown below.

### **What Information do we process and why?**

We collect and process personal information about you and others (if their personal information is provided by you) in accordance with our Data Protection Policy and in accordance with the General Data Protection Regulations.

The lawful basis of that processing depends on the nature of our relationship with you and is as follows:

Members of the Charity - Legal Obligation; Volunteers - Consent; Enquirers - Legitimate Interest; Customers - Contract; Donors - Legal Obligation; Supporters/Followers - Consent; Employees and Contractors - Legal Obligation; Emergency Contacts - Legitimate Interest.

We only keep personal information for as long as is necessary to meet our obligations to you and your legitimate interests or to meet our contractual, legal, regulatory or compliance obligations and our legitimate interests.

We keep identity and contact information; a record of your particular interests in Pilgrim and your sailing experience if you have given them to us; essential dietary and health information if you are sailing with us; emergency contact information in the event of an emergency, injury, illness or accident; together with any other information necessary for us to comply with the law or to meet our regulatory, contract or compliance obligations. These include, but are not limited to, our obligations to comply with company Law, accounting Law, taxation law, employment law and UK and international maritime law and to meet the needs of our insurers.

### **What are your rights?**

You have the right to ask if we have any personal information about you; to access that information; to correct any errors; to object to it being retained; to have the information erased (if applicable); the right to ask us to stop marketing to you; and if you are not satisfied with our response, you have a right to complain to the regulator in the UK, which is the Information Commissioner's Office, at <https://ico.org.uk/>.

**What about marketing communications?**

In all our marketing communications you have the ability to unsubscribe from further communications and to access your profile online to make clear your preferences for your involvement with our charity and your preferences for how we communicate with you. It is not possible to opt-out of receiving messages about any booking with us or our customer satisfaction surveys sent as part of our booking contract process (which are not considered as marketing for these purposes). This ensures we can always contact you in connection with your voyage with us and in order to improve our customer satisfaction for the future.

**We are a small charity and we have limited resources**

Being a charity run by volunteers we have few administrative resources and our limited funds are directly allocated to our charitable objects. That means we have adopted a policy where we manage our information retention and erasure responsibilities once a year at the end of the sailing season. However, unsubscribe requests and data protection requests are dealt with promptly as necessary.

**How long do we keep your information for?**

Where there is a legal requirement for us to keep information we retain it for the statutory period. In all other cases we retain it for the period necessary to meet our contractual, compliance or insurance requirements or until such time as consent lapses or is withdrawn. Where any of our data subjects ask us not to use their information for marketing purposes we cease using it for that purpose immediately.

**Do we share data with other organisations?**

We do not pass our information to any third parties under any circumstances unless we are required to do so for statutory, regulatory or compliance purposes. We do have Data Processing Agreements under the General Data Processing Regulations with IT infrastructure suppliers for cloud storage and for email processing. Details are available on request. We also have Data Processing Agreements with our reservations partners to permit the transfer of customer information to enable us to fulfil our contracts. Again, details are available on request.

**How can we be contacted with regard to this Policy or to exercise Data Protection rights?**

For questions or queries you can email [mailbox@pilgrimofbrixham.co.uk](mailto:mailbox@pilgrimofbrixham.co.uk)

If you want formally to exercise your data protection rights it is necessary to apply in writing to the **Company Secretary, Pilgrim Heritage Sailing Foundation at our registered office, 15 Fore Street, Brixham, Devon TQ5 8AA.**

Pilgrim Heritage Sailing Foundation is a charitable company registered in England and Wales at Companies House, Company No. 10763532 and is a registered charity, Charity Commission No. 1175124.

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