

Club Privacy Policy under the General Data Protection

Regulations (GDPR)

January 2024

"YourClub name"

Introduction

1. This policy concerns members personal information (data) held by the Club, its security and how the club may use this data.
2. The policy defines the people involved, the data collected by the Club, how it is stored and used internally and externally, and members' rights over their data.

Use of Data

3. The Club uses this data solely for the purposes of the effective running of the Club.

Members data is also shared with specific professional organisations depending on what type of membership each individual holds e.g. Bowling

Bowling members data may be shared with the Halifax and District Bowling Association; other relevant Yorkshire Leagues (only data of members involved in these specific leagues); JustGo and Bowls England.

Control of Data

4. The Data Controller for the purposes of the GDPR will be the Club through the Management Committee. They will be responsible for the implementation and review of this policy. Given the nature of data held and Club size, the appointment of a Data Protection Officer is not seen as required; any concerns relating to data protection should be addressed to the Club President, who will fulfil this role.

5. The Data Processors will be the Club Secretary, Treasurer, Director of Bowls and Director of Tennis who will hold separate club membership databases on their computers. Together, they will be responsible for the collection of the data, its security, ensuring that permission for the data to be held, used, and shared as described below is given, and updating of club records including deletion where required.

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What Data is Collected and Why

6. We collect all contact and membership details to enable us to properly to manage and administer your membership with us, and other relevant professional organisations. These details include your

contact details, date of birth, gender, and details of a contact in case of emergency. This information is required and collected as a standard part of your application to join or re-join our Club.

7. We also need to collect ethnicity and disability information for the purposes of equal opportunities monitoring and because we must promote an environment that is inclusive, fair, and accessible. For this information alone, we need your consent to collect it. The Club does not collect or hold any other 'sensitive data' such as health issues.

8. The table below summarises the types of data collected and the reasons for collection.

Data Collected Reason for Collection

Name

Address Required so that club information can be sent to members, who do not have an e-mail address. It also facilitates shared transport arrangements.

Phone Numbers Home and mobile numbers are requested for contact purposes.

E-mail address Prime means of communication with members over teams, events, general matters

Date of Birth Date of Birth is required to ensure that members pay the correct membership fee and are

qualified to enter certain competitions.

Gender Some competitions are gender specific.

Date of Joining Club To enable long-serving members to be identified and recognised.

Ethnicity Requested by BE for statistical analysis and equal opportunity monitoring

Disability To allow club to fulfil its safeguarding duties and make necessary adjustments

Emergency Contact

details

In case of accident or sudden illness of a member

Parent Contact

details

Required for any junior member under 18

When is the Data Collected and Reviewed?

9. This data is captured when a member first joins the Club through a Club Membership Application form and will be reviewed annually when a member renews their membership.

Who Collects and Holds the Data?10. The data is collected by the Club Secretary and/or Treasurer. To ensure the security of the data held, the Club requires that any digital device used for storage of this data is both encrypted and access to their computers is password protected and that any file holding the information is also individually password protected.

Sharing Personal Data outside the Club

11. Data is shared with other external organisations so that they too can properly manage and administer your affiliated membership with them. The data is shared via a national Membership Register, the content of which is controlled at all levels by limited and authorised access.

12. Neither the Club, nor any of the specified local, regional or national bodies permits the sharing of personal data held on the Membership Register to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.

13. Where direct consent is given by a member having an identified responsibility or role within their organisation, specific and limited information may be published by the Club and/or other specified organisations in annual handbooks or on their websites and other social media for the purposes of effective appropriate communication within the sport. The holders of posts within one or more of these organisations will be required to formally consent to the use of specified personal information in this way, and such consent will be recorded by the relevant organisation.

Member's Rights to their Personal Data

14. Each individual member has the right to review their personal data held on the Membership Register. No one else other than the club secretary and or Data processor (where applicable) has the facility to add or modify personal data. There will be no charge for such access to data. The data held on a member will be deleted within one month of notice that the member has left or is not re-joining the Club.

Young People's Data

15. GDPR will set an age for a young person to give their own consent to the collection and storage of their personal data. However, given the BE requirements concerning young people, if any club member is below 18, permission for the collection and use of their data will be sought from the parents/guardians of the young person.. Any member requiring contact with a young person should approach the Club Secretary to seek agreement for the release of contact details.

Breaches of Data Security

16. If at any point a breach of data security is suspected or identified, then that suspicion or fact must be reported immediately (verbally if necessary and confirmed in writing) to the Club President, who is responsible for investigating breaches of security, determining the resultant degree of risk and deciding on the action to be taken, reporting this at the first opportunity to the Management Committee.

17. Where a breach is likely to result in a serious risk to the rights and freedoms of individuals (say involving health or financial issues), the Club President has 72 hours to report the incident to the Information Commissioners Office (ICO).

18. The Club recognises that the requirements of the GDPR apply as much to paper files and records as it does to digital ones and will ensure that any paper records are similarly securely treated.

Security issues are much more problematic for paper records, the Club will seek to reduce the use of paper files to the minimum possible. Specifically, membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

Consent on the Holding and Use of the Data

19. On applying to join the Club, a member will be given a copy of this policy and asked to confirm that they have read and accept it and that the Club may use the personal data in the proper pursuance of managing their relationship with the member

20. In addition, members will be asked to consent to the publication of their name and contact details in the Club Contact Details sheet for communication with and by the club committee and relevant team captains and so that they and other members can arrange matches as part of Club Competitions.

21. The Club committee and individuals should always use a bcc system when any e-mails are sent to multiple members.

Reviews

22. Members are required to update their personal information as soon as reasonably practical should changes occur during the year.

At the annual subscription renewal, members will be asked to confirm the accuracy of the data held on them and to reconfirm to the use of it as set out in this policy.