



CLANFIELD BOWLS & SPORTS CLUB

(Thereafter known as the Club)

Data Protection Policy

Introduction

The Club collects and uses personal information [referred to in the General Data Protection Regulation (GDPR) as personal data] for members and suppliers. This information is gathered to enable the functioning of the Club. The Club may be required by law to collect, use and share certain information.

The Club does not have a Data Protection Officer. The board of Trustees and the Committee share responsibility for the safe keeping of data.

Purpose

This policy sets out how the Club deals with personal information correctly, securely and in accordance with the GDPR and other related legislation.

This policy applies to all personal information, however it is collected, used, recorded, and stored by the Club and whether it is held on paper or electronically.

What is Personal Information/Data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, by reference to details such as a name, a membership number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity.

Personal data include (but is not limited to) an individual's name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The GDPR establishes 7 principles and some additional duties that must be complied with at all times:

1. Lawfulness, Fairness and Transparency

Personal data shall be processed lawfully, fairly and in a transparent manner. For personal data to be processed lawfully it must be in line with one of the legal grounds set out in the GDPR. These include where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the Club.

Where the special categories of personal data are processed, this shall include where processing is necessary for reasons of substantial public interest.

When processing personal data and special category data for club business, the Club will ensure that these requirements are met where relevant.



2. Purpose Limitation

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes). The Club will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

3. Data Minimisation

Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

4. Accuracy

Personal data shall be accurate and where necessary, kept up to date; Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the Club of any changes in circumstances to enable records to be updated accordingly. The Club will be responsible for ensuring that updating of records takes place where appropriate.

5. Storage Limitation

Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The Club will comply with this and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

6. Integrity and Confidentiality

Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

7. Accountability

Personal data shall not be transferred to a country or territory outside the UK and the European Union (EU) / European Economic Area (EEA), unless that country or territory ensures an adequate level of data protection.

The Trustees have a General Duty of accountability for personal data.

Commitment

The Club is committed to maintaining the principles and duties in the GDPR at all times. The Club will:

- Inform individuals of the purposes that personal information is being collected for and the basis for this.
- Inform individuals when their information is shared, why and with whom, unless the GDPR provides a reason not to do this.



- Inform individuals of their data subject rights.
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the Club will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details on the length of time an individual's data will be kept.
- Should the Club decide to use an individual's personal data for a different reason to that for which it was originally collected the Club shall inform the individual and where necessary seek consent.
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft, and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests).
- Ensure that personal information is not transferred outside the UK and the EU/EEA without the appropriate safeguards.
- Ensure that all members are aware of and understand these policies and procedures.

Retention and Disposal of Personal Data

The Club will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

Complaints

Complaints will be dealt with by the Chairman of the Club. Complaints relating to the handling of personal information may be referred to the *Information Commissioner* who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at ico.org.uk

Review

This policy will be reviewed as it is deemed appropriate.