

Crowborough Wolfe Bowling Club



2021 Privacy Policy (General Data Protection Regulation)

About this policy

This policy explains when and why Crowborough Wolfe Bowling Club (CWBC) collect personal information about our members and how we use it, keep it secure and club member's rights in relation to it. This includes new members, visitors and guests. We will collect, use and store personal data, as described in this Data Protection Policy when people engage in activities at the club. Normally this will be through a level of membership (whether playing or social).

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our notice boards regularly for any amendments. 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).

Responsible Person

For the purposes of the GDPR, CWBC will be the "Controller" of all personal data we hold about club members and others, and we also are a "Processor" of data. The Ethics, Compliance and Safeguarding Officer is responsible for making sure the club complies with the General Data Protection Regulation (GDPR) which has been applicable since 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it or not.

What is Personal Data

"Personal data" is any information from which an individual can be identified or is identifiable. This will include name, address, and financial details. It also includes identifiers such as an IP address collected when an individual visits a website. The law also covers 'Special Category Data' such as race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sexual life or orientation.

CWBC recognises that the legislation is a product of the digital age - more and more organisations of all types and sizes are processing and sharing individuals' information in the course of delivering a service or product. The law recognises that individuals are entitled to have their personal data protected and to be in control of that data regardless of how it is used or who is using it. The GDPR governs how data controllers process, obtain and use data to ensure it is managed in a fair, lawful and transparent manner.

What are our obligations

CWBC must ensure that any third parties engaged to process data on the club's behalf, also referred to under the law as "Processors", also comply with the law. A data processor could be a marketing company engaged to carry out a campaign or survey on behalf of the club's members, a website host or data storage platform in the cloud that manages the club's data collection and storage.

Member's Rights

You have rights under the GDPR:

- To access your personal data
- To be provided with information about how your personal data is processed
- To have your personal data corrected
- To have your personal data erased in **certain circumstances**
- To object to or restrict how your personal data is processed in **certain circumstances**

For more details, please address any questions, comments and requests regarding our data processing practices to the CWBC Ethics, Compliance and Safeguarding Officer.

How we protect your personal data

The Data Controller will process membership information and hold all information securely. Paper copies of data will be held and secured appropriately, and committee members (or those responsible for fixture coordination) will have appropriate access to contact details (which will also be available to club members through the fixture list). Club Officers will be required to provide consent for their full contact details to be published to club members.

In the unlikely event of a breach of the security of data we will notify members promptly and we will never sell or pass on your personal data.

Request to see your personal information

If you wish to know what personal data the club holds please email the Ethics, Compliance and Safeguarding Officer who will respond to the request within 28 days.

Accuracy and retention of data

Each individual member is responsible for keeping the Membership Secretary informed of changes to their data (e.g. address/telephone number etc.) and this is updated at least once a year at renewal and you are at that time authorising the club to hold such data on file. The data will be normally be kept for up to 7 years for instances where we are required to do so (e.g. in the event of injury or accident). Names and scores may be kept indefinitely for reason of historical significance (e.g. on trophies, plaques, noticeboards and other awards). Aside of these examples, CWBC will not retain personal data or information beyond a registered playing season unless by specific (and approved) request.

The 6 principles on which the lawful bases of processing personal data rest:

- 1 **Lawfulness, fairness and transparency:** personal data must be processed lawfully, fairly, and transparently
- 2 **Purpose limitation:** data should only be collected and processed for a specific, legitimate purpose and not used any way that is not compatible with that purpose
- 3 **Data minimisation:** only that data that is necessary in relation to the specific requirement should be collected and processed
- 4 **Accuracy:** personal data should be accurate and, where necessary, kept up to date
- 5 **Storage limitation:** the personal data should identify the data subjects to enable accurate record keeping so that it is kept for no longer than is necessary
- 6 **Integrity and confidentiality:** appropriate security measures should be put in place (such as encryption, passwords, and securely locked cabinets) to protect against unlawful or unauthorised processing, and against loss, destruction, or damage.

Accountability is a key element of all six principles. By embedding these into CWBC's operations and showing how it is accountable, we can prove we meets our GDPR obligations. Therefore:

- Before we obtain and start to use an individual's set of data, we have identified the lawful basis on which it will rely before we proceed.
- CWBC's "lawful basis" for controlling and processing data is to fulfil membership obligations as part of its membership application form (which is essentially a contract). We also hold data for members to allow them to be kept informed about CWBC activities. Hence the lawful bases of performing a contract and legitimate interests to keep members informed on club events, competitions etc apply
- We also ask for individual "informed consent" on membership registration documents