

# Civil Service Bowling Club (Chatham)

## Data Protection Policy

### 1. Introductory Statement

The club's data protection policy aims to set out the manner in which personal data on members are kept and how the data concerned is protected.

This policy has been drafted by the Officers and adopted by the Committee. It is reviewed regularly at least every 12 months and in conjunction with any changes to UK (European) legislation.

Clubs are obliged to comply with the General Data Protection Regulation (GDPR) enforceable from 25<sup>th</sup> May 2018.

### 2. Scope

The policy applies to the keeping and processing of members' personal data, both in manual form and on computer.

*Data: means information in a form which can be processed. It includes automated data (information on computer or information recorded with the intention of putting it on computer) and manual data (information that is kept as part of a relevant filing system).*

*Personal data: means data relating to a living individual who is or can be identified from the data that is likely to come into the possession of the data controller.*

*Data Controller: A data controller is the individual or legal entity which controls the contents and use of personal data. The Management Committee is considered to be the data controller, with the Club Secretary and Chairman principally acting for the Management Committee in exercising the functions involved.*

### 3. Rationale

To be able to keep members up to date with information, and to advise them in respect of specific requirements, the club must maintain a register of all current members.

The data controller may need to supply personal data to the data controller of another prescribed body if they are satisfied that it will be used for a "relevant purpose" only.

The data controller may need to supply personal data to another member of the club for the purpose of arranging a specific action related to the objectives of the club.

The processing is necessary for compliance with a legal obligation for which the Data Controller is subject (e.g. insurance purposes)

### 5. Objectives

**The objectives are:**

- To ensure that the club complies with the GDPR.
- To ensure compliance by the club with the eight rules of data protection as set down by the Data Protection Commissioner.
- To ensure that the data protection rights of club members are safeguarded.

### Key measures

**A. The personal data records for members held by the club may include:**

- Name, address and contact details on a computer database and manual record
- Emergency contact number in case of accident/emergency as a manual record
- Original records of membership application as a manual record

- Details of complaints and/or grievances including discussions and actions/sanctions on a computer database or manual record

**Club Secretary, Chairman and Web-master records:** These may include:

- All of the above  
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- Records in relation to appointments to the Committee on a computer database
- Minutes of Committee meetings and associated correspondence which may include references to particular individuals on computer databases.

## **B. Details of arrangements in place to ensure compliance with the 8 rules of data protection**

The policy sets out the arrangements in place to ensure that all personal data records held by the club are obtained, processed, used and retained in accordance with the following eight rules of data protection (based on the Data Protection Acts):

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than is necessary for the purpose or purposes
8. Give a copy of his/her personal data to that individual on request.

The minimum age at which consent can be legitimately obtained for processing and disclosure of personal data under rules 1 and 3 above is not specifically defined. However, guidance material published on the Data Protection Commissioner's website states the following:

*"As a general rule, a member aged eighteen or older may give consent themselves. A student aged from twelve up to and including seventeen should give consent themselves and, in addition, consent should also be obtained from the parent or guardian. In the case of junior members under the age of twelve consent of a parent or guardian will suffice."*

### **The arrangements put in place by the CSBC (Chatham) are as follows**

#### **1. Obtain and process information fairly:**

- Procedures are in place to ensure that members, parents/guardians or carers are made fully aware when they provide personal information of the identity of the person who is collecting it, the purpose in collecting the data, the persons or categories of persons to whom the data may be disclosed and any other information which is necessary so that processing may be fair.
- Personal information is processed fairly in accordance with the GDPR, with consent being obtained from members, or parents/guardians where required.

#### **2. Keep it only for one or more specified, explicit and lawful purposes:**

- People whose data is collected know the reason/s why it is collected and kept
- The purpose for which the data is collected and kept is a lawful one
- The Committee are aware of the data kept and its specific purpose

#### **3. Use and disclose it only in ways compatible with these purposes:**

- The data is used only in ways consistent with the purpose/s for which it was obtained
- The data is disclosed only in ways consistent with that purpose
- Some personal data can be disclosed to third parties for the purpose of undertaking a match or competition.

Exceptions to disclosure rule:

- Data can be disclosed when required by law
- Data can generally be disclosed to an individual himself/herself or with his/her consent (see 8 below).

**4. *Keep it safe and secure:***

Appropriate security measures are taken against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction.

- Access to the information (including authority to add/amend/delete records) is restricted to authorised Club Officers on a “need to know” basis
- Control on access to information is based on this “need to know” policy
- Computer systems are password protected
- Back-up procedures are in operation for computer held data
- All reasonable measure are taken to ensure that Club Officers are made aware of the security measures, and comply with them
- All waste papers, printouts etc. are disposed of carefully
- Steps are taken to ensure that no unauthorised person can access data from computers
- There is a designated person responsible for security. The CSBC Secretary is the Security Controller.
- There are periodic reviews of the measures and practices in place
- The premises are secure when unoccupied

**5. *Keep it accurate, complete and up-to-date:***

- Clerical and computer procedures are adequate to ensure high levels of data accuracy
- Appropriate procedures are in place, including periodic review and audit, to ensure that each data item is kept up-to-date

**6. *Ensure that it is adequate, relevant and not excessive:***

- The information held is adequate in relation to the purpose/s for which it is kept
- The information held is relevant in relation to the purpose/s for which it is kept
- The information held is not excessive in relation to the purpose/s for which it is kept

**7. *Retain it for no longer than is necessary for the purpose or purposes:***

- Personal data is only kept for the period of time the person is a fully paid up member and 12 months after in case circumstances have prevented renewal of membership

**8. *Give a copy of his/her personal data to that individual on request***

On making an access request any member (subject to the restrictions in Notes A and B of the club’s Policy Statement) about whom the CSBC keeps personal data, is entitled to:

- a copy of the data which is kept about him/her
- know the purpose/s for processing his/her data
- know the identity of those to whom the data is disclosed
- know the source of the data, unless it is contrary to public interest
- know the logic involved in automated decisions
- a copy of any data held in the form of opinions, except where such opinions were given in confidence.

To make an access request, an individual must:

- apply in writing or by email
- give any details needed to help identify him/her and locate the information that the club may keep.

**Handling access requests:**

- The Club Secretary is responsible for handling access requests
- Procedures are in place to provide members with access to personal data about themselves within 1 month of the request in accordance with the Data Protection Acts as detailed in the club's Policy statement. Identity may be requested.
- Procedures are in place to rectify or erase any inaccurate information as identified by the individual on whom the data is kept, within 1 month of the request being made

#### **Implementation Date**

This policy was implemented in May 2018

#### **Reviewing and evaluating the policy**

The policy will be reviewed and evaluated every 12 months by the Club Officers and Committee.

# CIVIL SERVICE BOWLING CLUB (CHATHAM)

## PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice relate to the Civil Service Bowling Club (Chatham).

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws, as we not required to do so, but our Club Secretary has overall responsibility for data protection compliance in our organisation. Contact details are set out in the, "Contacting us," section at the end of this privacy notice.

### 1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of membership you register for with us, you may initially provide us with, or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- any other information included as part of the application process for membership;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance at any events organised by us;
- CCTV footage;
- photographs;
- identification documents such as passport;
- details of any county membership;
- details of next of kin, family members and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance;
- any disciplinary and grievance information;

### 2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your health, including any medical condition.

In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of personal safety;
- it is necessary for the establishment, exercise or defence of legal claims;
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

### 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the club, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of next of kin and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of whom you feel it is appropriate to do so. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer the membership you have with us	Contact and membership details	This is necessary to enable us to properly manage and administer your membership of the CSBC.
To arrange and manage the main activity of the club.	Contact details, Records of your interactions with us.	This is necessary to enable us to carry out the main activity of the club - the organisation of matches for the game of bowls
To send you information about bowls competitions and events, organised by the CSBC and affiliated bodies.	Contact and membership details.	This is necessary to enable us to organise the main activity of the club, i.e. playing bowls.
To send you other information we think you might find useful including our newsletters, information about membership, events, and products and information supplied by affiliated bodies, e.g. CSSC	Contact details	Where you have given us your explicit consent to do so.

<p>To answer your queries or complaints</p>	<p>Contact details and records of your interactions with us</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.</p>
<p>Retention of records</p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>The security of our IT systems</p>	<p>Our web-site is password protected and only holds members phone numbers and email addresses. The CSBC has no other IT Systems in operation.</p>	<p>We have a legitimate interest to ensure that our web-site is secure.</p>
<p>To establish event attendance</p>	<p>Records of your attendance at any events or competitions hosted by us in order to gauge your experience in relation to the sport of bowls</p>	<p>We have a legitimate interest in doing so to ensure that our membership is being treated fairly and that members are picked for relevant competitions.</p>
<p>For the purposes of membership interest on the club’s web-site</p>	<p>Photographic images.</p>	<p>Where you have given us your explicit consent to do so.</p>

<p>To comply with health and safety requirements</p>	<p>Records of attendance, CCTV footage and medical information about your health</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To administer your attendance at any courses or programmes you sign up to</p>	<p>All contact and membership details, transaction and payment data.</p> <p>Details of any county membership and performance data.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.</p>
<p>To arrange for any trip or transportation to and from an event</p>	<p>Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>



<p>To gather evidence for possible grievance or disciplinary hearings</p>	<p>All the personal information we collect</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the, "Contacting us," section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you.
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.

- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

## 7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside the UK.

## 8. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 24 months after your last contact with us or the end of your membership. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

## 9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However,

some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us," section below. If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

#### **10. CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

#### **11. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [michaelnov49@gmail.com](mailto:michaelnov49@gmail.com) or write to us at

**Civil Service Bowling Club (Chatham)**  
**Watling Street**  
**Gillingham**  
**Kent**  
**ME8 6BY**

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