

IVER HEATH BOWLS CLUB

Policy on Privacy and General Data Protection Regulations (GDPR)

Introduction – This policy concerns the personal information (**data**) held by the Club, its security and use.

The policy is written in response to the **GDPR**, in force from 25 May 2018. It 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.

The Club uses this data solely for the purposes of the effective running of the Club. It does not share the data with anyone without your consent except Buckinghamshire Bowls Association (BBA) and Bowls England (BE) for some specific post holders and affiliation purposes.

How do we collect this personal information?

All the information collected is obtained directly from you. This is usually at the point of your initial membership application. Subsequently, the information will be collected via membership renewal forms, etc. At the point that you first provide your personal information for membership purposes, we will also request that you provide consent for us to store and use your data. This request will also be made on annual renewal. Your consent is required in order to ensure our compliance with data protection legislation.

Consent on the Holding and Use of the Data

On applying to join the Club, a member will be made aware of this policy and asked read it on our website. They may request a hard copy. They will be advised that the Club may contact them through mail, e-mail and/or phone as outlined. Such communications will be restricted to matters such as: BBA and BE issues; club meetings, minutes and events; availability for and selection of teams; and other such club related material. In addition, they will be asked to consent to the publication of their name and phone number(s) and email address for communications and so that they and other members can arrange matches as part of Club Competitions.

It should be noted that if consent is withdrawn for the publication of any data in printed form it will be removed from the next publication but will remain in previously printed editions of publications.

The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

The **Data Controller** for the purposes of the GDPR will be the **Club** through the 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 Chairman** who will fulfil this role.

The **Data Processor** will be the **Club Secretary** who will hold the club membership database. The Secretary 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 if required.

What Data is Collected and Why

It is necessary for the personal information to be collected for the effective running of the Club as tabulated below:

Data Collected	Reason for Collection
Name	This is necessary for legal, insurance and licensing purposes. In addition, the Club is entitled to be aware of who is permitted to be on its premises
Address	Required so that club information can be sent to members, not all of whom have an e-mail address. In addition, it facilitates shared transport arrangements
Phone Number	Home and mobile numbers are for competitions, contact purposes and handbooks
E-mail address	The means of communication with members over competitions, teams, events, general matters and for handbooks
Under or over 18 years old	Club fees are age dependent so this is required to establish the correct fees.
Gender	Some competitions are gender specific
Disability	This voluntary information is necessary to make the club aware of any special needs a member may have.

When is the Data Collected and Reviewed

This data is captured when a member first joins the Club through a Club Membership Application form. The accuracy of the personal information will be reviewed annually when a member renews their membership.

Who Collects and Holds the Data

The data is collected and held by the Club Secretary. To ensure the security of the data held, the Club allows no other access to this computer.

What Data is Shared outside the Club

BBA – The BBA publishes annual handbooks which contain contact information which may include:

- **Club Secretary** – name, address, phone number(s) and e-mail address;
- **Match Secretary** – name, address, phone number(s) and e-mail address;
- **County Inter-Club Competition Organiser** – (Women's Division) name and phone number(s).

The holders of these posts will be required to confirm that they agree to the sharing and publication of this data.

Bowls England - publish an annual handbook which contains contact information for the Club.

The Club will require that organisations do not further share the data or use it for any purpose except communications and publications as specified above. The Club will not release the data to any other organisations for marketing or other purposes. The data is not used in any form of automated decision making or profiling.

Members are also asked to provide some personal information on entry to County Competitions. This area is not a club matter and is therefore dealt with separately by the GBA Policy, a copy of which can be obtained from the appropriate Divisional Secretary.

No data is shared by the Secretary within the Club except telephone numbers so that members and team captains may arrange teams for games and contact members over a match should the need arise.

The Club will not publish any personal data on the club website except names and telephone numbers of club officers and officials.

Member's Rights to their Personal Data

All members have the right to be provided with a copy of the data held on them by the Club. Any request for this should be made in writing (including e-mail) to the Club Secretary. The Club has one month to reply to any such request. There will be no charge for such access to data. The data held on a member will be deleted within six months of notice that the member has left or is not re-joining the Club unless they request that details are kept for social purposes.

Young People's Data

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 Secretary to seek agreement for the release of contact details.

Breaches of Data Security

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 Chairman 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 Committee.

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 Chairman has 72 hours to report the incident to the Information Commissioners Office (ICO).

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. As security issues are much more problematic for paper records, the Club will seek to reduce the use of paper files to the minimum possible.

Reviews

It is expected that a member will update their personal information if it changes during the year. At the pre-season meeting members will be reminded to confirm the accuracy of the data held and the policy on our website.

Timescale

We will store your personal information in electronic form, and paper-based form, from the point of collection for as long as you are a member of the Club. After you cease to be a member, your personal information will be retained for a period of 3 months, before being deleted/destroyed. After you cease to be a member, you will have the option of giving your express consent for your Personal Information to remain on our database, for the purposes of "Social Membership" relating to IHBC news and events only.

Photographs

We may take photographs of you attending matches or other events and we may wish to use them for marketing and advertising purposes, or publishing on our website. Unless you advise us otherwise, you expressly agree and consent to the use of any photographs which may include you without compensation. We will not use the images taken, or any other information you provide, for any other purpose. We will not include details or full names (which means first name and surname) of any person in an image on our website, on video, or in printed publications, without good reason. For example, we may include the full name of a competition prize winner if we have their consent.

