

Harrogate Bowling Club - Data Protection Policy

Our Policy

Harrogate Bowling Club (the "Club") is committed to complying with data protection law and to respecting the privacy rights of members.

This Data Protection Policy ("**Policy**") sets out our approach to data protection law and the principles that we will apply to our processing of personal member data. The aim of this Policy is to ensure that we process personal data in accordance with the law and with the utmost care and respect, whilst applying proportionality to reflect the scale and limited activities of the Club.

We recognise that Officers of the Club ("**Officer(s)**") have an important role to play in achieving these aims. It is your responsibility as an Officer therefore, to familiarise yourself with this Policy and to apply and implement its requirements when processing any personal data.

Please pay special attention to section 8, as this sets out the practical day to day actions that you must adhere to when working/volunteering for the club.

If at any time you have any questions on this Policy, your responsibilities, or any aspect of data protection law, please seek advice from the Membership Secretary.

1. Who is responsible for data protection?

- 1.1 All Officers and authorised members (i.e. members who process personal member data in order to fulfil their role at the Club) are responsible for data protection, and each person has their role to play to make sure that we are compliant with data protection laws.
- 1.2 Should you provide personal member data to another member of the club who needs to contact other members to carry out their role (e.g. team captains, catering/green teams etc), it is your responsibility to make sure that they also comply with this Policy. The number of members authorised to process data must be kept to a minimum and controlled.
- 1.3 We are not required to appoint a Data Protection Officer (DPO). However, the Membership Secretary has agreed to be responsible for maintaining this Policy and overseeing the Club's compliance with data protection laws.

2. Status of this Policy and the implications of not complying

- 2.1 If you do not comply with Data Protection Laws and/or this Policy, then you are encouraged to report this fact immediately to the Membership Secretary.
- 2.2 Also, if you are aware of or believe that any other Officer or authorised member is not complying with Data Protection Laws and/or this Policy, you should report it in confidence to the Membership Secretary.
- 2.3 There are a number of potential serious consequences for both individuals and the Club if we do not comply with Data Protection Laws. These include criminal sanctions, fines, enforcement action, court orders, compensation claims and bad publicity.

3. **Data protection laws**

- 3.1 The Data Protection Act 2018 and the General Data Protection Regulation ("**GDPR**") applies to any personal data that we process. Data protection law in the UK is enforced by the Information Commissioner's Office ("**ICO**"). The ICO has extensive powers.

4. **Lawful basis for processing data**

- 4.1 For personal data to be processed lawfully, we must be processing it on one of the legal grounds set out in the Data Protection Laws.

- 4.2 For the processing of ordinary personal data in our organisation these may include, among other things:

4.2.1 the data subject has given their consent to the processing (and has the right to withdraw this consent);

4.2.2 the processing is necessary for the performance of a contract with the data subject (for example, for processing membership subscriptions/renewals);

4.2.3 the processing is necessary for compliance with a legal obligation to which the data controller is subject; or

4.2.4 the processing is necessary for the legitimate interest reasons of the data controller (for example, keeping in touch with members, players, participants about competition dates, upcoming fixtures, or access to club facilities).

- 4.3 Taking account of the Club's activities, we will process member data for membership applications, renewals, team/competition entries and subscriptions using the 'performance of a contract' lawful basis. For keeping in touch with members concerning competitions, fixtures, rink bookings and events etc we will process data using the 'legitimate interests' lawful basis.

- 4.4 Virtually anything we do with personal data is processing, including collection, modification, transfer, viewing, deleting, holding, backing up, archiving, retention, disclosure or destruction. So even just storage of personal data is a form of processing. We might process personal data using computers, the Club's website and rink diary application, or manually by keeping paper records.

5. **Data protection principles**

- 5.1 The Data Protection Laws set out 6 principles for maintaining and protecting personal data, which form the basis of the legislation. All personal data must be:

5.1.1 processed lawfully, fairly and in a transparent manner and only if certain specified conditions are met;

5.1.2 collected for specific, explicit and legitimate purposes, and not processed in any way incompatible with those purposes ("purpose limitation");

5.1.3 adequate and relevant, and limited to what is necessary to the purposes for which it is processed ("data minimisation");

- 5.1.4 accurate and where necessary kept up to date;
- 5.1.5 kept for no longer than is necessary for the purpose ("storage limitation");
- 5.1.6 processed in a manner that ensures appropriate security of the personal data using appropriate technical and organisational measures ("integrity and security").

6. **Data subject rights**

- 6.1 Under Data Protection Laws individuals have certain rights (**Rights**) in relation to their own personal data. These are listed in the Club's Privacy Notice, which is available to all members (i.e. displayed within the members' area of our website and the Clubhouse notice board).
- 6.2 The exercise of these Rights may be made in writing, including email, and also verbally and should be responded to in writing by the Membership Secretary without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We must inform the individual of any such extension within one month of receipt of the request, together with the reasons for the delay.
- 6.3 There are very specific exemptions or partial exemptions for some of these Rights and not all of them are absolute rights.
- 6.4 Where an individual considers that we have not complied with their request e.g. exceeded the time period, they can seek a court order and compensation. If the court agrees with the individual, it will issue a Court Order, to make us comply. The Court can also award compensation. They can also complain to the regulator for privacy legislation, which in our case will usually be the ICO.
- 6.5 In addition to the rights discussed in this document, any person may ask the ICO to assess whether it is likely that any processing of personal data has or is being carried out in compliance with the privacy legislation. The ICO must investigate and may serve an "Information Notice" on us (if we are the relevant data controller). The result of the investigation may lead to an "Enforcement Notice" being issued by the ICO. In the unlikely event of an Officer receiving such a notice, they must immediately pass the communication to the Club's Membership Secretary.

7. **Your main obligations**

- 7.1 What this all means for you can be summarised as follows:
 - 7.1.1 Treat all personal data with respect;
 - 7.1.2 Treat all personal data how you would want your own personal data to be treated;
 - 7.1.3 Immediately notify the Membership Secretary if any individual says or does anything which gives the appearance of them wanting to invoke any rights in relation to personal data relating to them;
 - 7.1.4 Take care with all personal data and items containing personal data you handle or come across so that it stays secure and is only available to or accessed by authorised individuals; and

7.1.5 Immediately notify the Membership Secretary if you become aware of or suspect the loss of any personal data or any item containing personal data.

8. **Practical matters**

8.1 Whilst you should always apply a common sense approach to how you use and safeguard personal data, and treat personal data with care and respect, set out below are some examples of dos and don'ts:

8.1.1 The Club will only process member data that is necessary for its purpose. Currently this data includes the member's gender, full name, address, contact telephone number(s), email address, competitions/teams entered, rink bookings, subscriptions paid and the date of joining the Club. For photography see the Privacy Notice.

8.1.2 The Membership Secretary is responsible for maintaining the 'master' membership electronic lists/paper files/back-ups. Officers and authorised members should use only the files distributed (password protected) by the Membership Secretary at the commencement of each season.

8.1.3 The Club operates a website (<https://www.harrogatebc.co.uk>) and a rink diary application (<https://www.harrogate.rinkdiary.co.uk>). Both sites are secure and private (HTTPS enabled) and use SSL encryption which helps to protect members' personal information. The website and rink diary are maintained by a small team of technical administrators. Only paid-up members may access the website members' area and rink diary application, and password-protected member registrations are authorised by the Membership Secretary or one of the other technical administrators.

8.1.4 Password protection must be maintained at all times and to protect data integrity and security you should not create and process your own personal data files.

8.1.5 The Membership Secretary will securely destroy/delete paper and electronic files relating to prior year membership application/renewals within 12 months following the end of the relevant bowling season.

8.1.6 Any Officer or authorised member processing data should also securely destroy/delete paper and electronic files, other than the most recent data files distributed by the Membership Secretary for each new season.

8.1.7 When sending emails to a group of members always send the email to yourself and use the blind copy ("**BCC**") facility for the group list in order to maintain the confidentiality of each member's email address.

8.1.8 Any Officer or authorised member vacating their role should immediately and securely destroy/delete or hand back any paper and electronic files they hold.

8.1.9 Do not take personal data out of the Clubhouse or your home (unless absolutely necessary).

8.1.10 Only disclose passwords for any of our data lists to Officers or authorised members who should access the data, and not to anyone else.

FOR INTERNAL CIRCULATION TO OFFICERS AND MEMBERS OF THE CLUB

8.1.11 Never leave any items containing personal data unattended in a public place or in unsecure locations e.g. on a train, in a café, back seat of a car etc.

8.1.12 Use confidential waste disposal (e.g. a shredder) for any papers containing personal data; do not place these into the ordinary waste.

8.1.13 Do not leave personal data lying around; store it securely.

8.1.14 When speaking on the phone in a public place, take care not to use the full names of individuals or other identifying information, as you do not know who may overhear the conversation.

8.1.15 **Do not transfer personal data to any third party without the member's consent, other than to the governing bodies to which we are affiliated or to comply with any legal and regulatory obligations.**

8.1.16 The Membership Secretary will erase the personal data of a departing/deceased member within 12 months following the end of their last season as a member of the Club. The Membership Secretary will also arrange to remove any website and rink diary registrations at the earliest opportunity.

8.1.17 Do notify our Membership Secretary immediately of any suspected security breaches or loss of personal data.

8.1.18 If any personal data is lost, or any devices or materials containing any personal data are lost, report it immediately to our Membership Secretary.

8.2 If you see any areas of risk that you think are not addressed, then please bring it to the attention of our Membership Secretary.

9. Questions

9.1 If you have any questions about this Policy please contact either the Membership Secretary or any member of the Club's Management Committee.

Tony Burdin, Membership Secretary for and on behalf of the HBC Management Committee 07 February 2021