Malden Manor Bowling Club

Data protection policy in accordance with the EU General Data Protection Regulation (GDPR) – Issue: 1st September 2018

1 Malden Manor Bowling Club Privacy Notice

The Malden Manor Bowling Club (hereafter 'the Club') respects your right to privacy. As part of our commitment to protect your privacy, we have produced this notice to explain what personal data we hold and how we use it. We also want to make you aware of your rights under the General Data Protection Regulation (GDPR). Our aim is to be fair and transparent about how we use your personal data, in order to foster greater trust between the Club and yourself.

2 What personal data we hold and why?

When you sign up as a member of the Club, you provide us with personal data on your membership form. The personal data will include your:

- a) Title: (as preferred for correspondence)
- b) Surname
- c) First names
- d) Preferred name to be known by
- e) Postal address
- f) Phone number: for inclusion in the Club Fixture Card
- g) Alternative contact phone number
- h) Email address (not openly shown, except for those of club officials): for receiving Club information
- i) Date of birth: for entry to age-related competitions and/or qualifying for Junior Membership
- j) Emergency contact details (optional)

This is (predominantly) the only personal information we hold. We would like to be made aware of any significant health problems and special Emergency Contact details, these are classed as 'Special Category Data' and require greater protection, because of their sensitive nature.

3 How do we collect this personal information?

All the normal, personal information collected is obtained directly from you on your initial membership application. Subsequently, the information will be revised annually via membership renewal forms. At the point that you first provide your personal information for membership purposes, we will also request that you provide consent, via a signature, for us to store and use your data. This request will also be made on annual renewal. Your consent is required for us to use your data where the lawful basis for processing is consent (please see below).

4 How we use your personal data?

The GDPR requires organisations to justify why they use your personal data and specify which of the six 'Lawful Basis for Processing' they are assigning to each task.

4.1 Membership and Club management

- a) Registering and administering your membership
- b) Informing you of Club-related news and statutory items, such as AGM notices
- c) Sending you the Club Newsletter
- d) Contacting you for availability in matches and competitions

The lawful basis for processing is: 'Contract'.

4.2 Matches, Competitions and Club Activities

- a) sharing contact details with club captains, vice-captains or team managers to help manage team selection for matches
- b) sharing contact details with other Club Members to help arrange competitions
- c) sharing contact details with internal league organisers
- d) sharing adult contact details with all Club Members via the Club fixture card
- e) sharing with Coaches for planning and executing coaching sessions
- f) sending agendas and minutes for meetings and advising of forthcoming meetings.
- g) sharing details with other Club Members for transportation or delivery purposes

The lawful basis for processing is: 'Legitimate Interests'. You can ask for details not to be shared, but this would make it difficult for your inclusion in matches and competitions.

4.3 Social Activities and meetings

- a) sending information on Club events, such as social evenings
- b) sending information on immediate Club news, funerals etc
- c) distribution of the Club Newsletter
- d) general communication on Club matters

The lawful basis for processing is Consent. You will only receive these communications automatically if you have given your initial consent and will need to let the Club know if you wish to opt out. You can choose to stop receiving these communications by informing the appropriate Club official.

4.4 Who we share your personal data with

4.4.1 Outside Bodies

If you have joined as a playing member, not a social member, we are required to forward your name and email to the Surrey governing bodies - Bowls Surrey, SCBA and SCWBA. This is to validate your affiliation to the respective associations and the National governing body - Bowls England. For further information of how your data is used by these organisations, please refer to their Privacy Notices.

4.4.2 Outside competitions

If you enter a National, Surrey or District Association competition, we will forward your address, telephone number and email, also your age if entered for an age-related competition.

4.4.3 Social Media

The Club is not currently involved in any Social Media groups. We do not pass your details to any such services. If you provide your own data to any Social Media groups, they will be governed by their own Privacy Policies. If you have concerns over your personal data, you should contact the Service concerned.

4.4.4 Overseas

We do not share your personal data outside of the UK without your prior permission.

5 How long we keep your personal data

Your personal data will be held for as long as you are a member of the Club and retained for two years after cessation of membership.

Data is reviewed annually. Old data is deleted or shredded.

6 How do we store your personal data?

We have in place a range of security safeguards to protect your personal information against loss or theft, as well as unauthorised access, disclosure, copying, use, or modification.

Your data is held by one or more of the following methods:

6.1 Paper Records

Members' details on paper form are kept in a locked filing-cabinet in a secure area of the Clubhouse.

6.2 Electronic Records

Members' details are held electronically on a password-protected database/spreadsheet held by the Database Manager. This is periodically updated with a password-protected copy held by the Deputy Database Manager,

Note:

The Club's website is run by the Webmaster and stores no personal data. The website does display the Club's Officers names, Official Club Contact name, together with a telephone number also a named photograph of the current President.

Details may be displayed on the website from time to time in recognition of members' achievements e.g. competition and match winners. The details may include:

- a) Photographs
- b) Names

The "Lawful Basis" for holding this data is consent.

6.3 Special category data

Members may register any health data or medical conditions. This information will be securely held pursuant to the methods identified in 6.1 and 6.2 above and will not be available to the public.

6.4 Children

We will collect additional information on parents and guardians in line with our Safeguarding Policy. We will never disclose the child's details without the prior consent of the parents/legal guardians.

7 Your rights to control your personal data

The GDPR provides you with a number of rights over your personal data. At any time, you can:

- a) request information about how the Club handles your personal data
- b) request your details to be updated or deleted
- c) submit a 'Subject Access Request' (SAR) which will require the Club to provide you with a copy of your data as held by the club.
- d) restrict or object to the way your details are used, such as opting-out of the Club's communications

All requests for information, opting out, or restricting how the Club uses your personal information should be made in writing to the Club Secretary.

8 Availability and changes to this policy

This policy is available and filed with the Club Constitution in the Clubroom. This policy may change from time to time. If we make any material changes we will make members aware of this

via: Club emails, the Club newsletter, at Club Meetings, on Notice Boards any or all of which may be appropriate at the time.

9 How to complain

If you are not happy with the way the Club has handled your data privacy, you can complain to the Information Commissioner's Office (ICO). They are the UK's Data Protection watchdog or 'Supervisory Authority'. You can submit a complaint via https://ico.org.uk/concerns/ or call 0303 123 1113.

10 Contact us

If you have any questions about the Club's privacy policy or practices, please contact the Club's current Safeguarding Officer or Club Secretary as shown in the Fixture Card.

Malden Manor BC Manor Park, Malden Road, New Malden, KT3 6AU