**Hunstanton Bowls Club**

Recreation Ground, Cromer Road, Hunstanton PE36 6BT

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Affiliated to: Bowls England, Norfolk Bowling Association

**Club Privacy Policy under the General Data Protection Regulations (GDPR)**

***Introduction***

1. This policy concerns the personal information (**data**) held by the Club, its security and use.
2. 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.

***Use of Data***

1. The Club uses this data solely for the purposes of the effective running of the Club. It also shares the data with the Norfolk Bowls Association (NBA) and Bowls England (BE) for their purposes in administering our sport.

***Control of Data***

1. The **Data Controller** for the purposes of the GDPR will be the **Club** through the Management 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.
2. The **Data Processors** will be the **Club Secretary and Membership Secretary,** who will hold separate club membership databases on their computers. Together they 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 where required.

***What Data is Collected and Why***

1. We collect all contact and membership details to enable us properly to manage and administer your membership with us, the NBA and BE. These details include your contact details, date of birth, gender, and details of a contact in case of emergency. This information is lawfully required and collected as a standard part of your application to join or re-join our Club.
2. We also need to collect ethnicity and disability information for the purposes of equal opportunities monitoring and because we must promote an environment that is inclusive, fair, and accessible. For this information alone, we need your consent to collect it. The Club does not collect or hold any other ‘sensitive data’ such as health issues.
3. The table below summarises the types of data collected and the reasons for collection.

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| **Data Collected** | **Reason for Collection** |
| **Name \*** | This is necessary for legal, insurance and licensing purposes. 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, who do not have an e-mail address. It also facilitates shared transport arrangements. |
| **Phone Number \*** | Home and mobile numbers are requested for contact purposes and in the Club handbook. |
| **E-mail address \*** | Prime means of communication with members over teams, events, general matters and for the handbook. |
| **Date of Birth** | Date of Birth is required to ensure that members pay the correct membership fee and are qualified to enter certain competitions. |
| **Gender** | Some competitions are gender specific. |
| **Date of Joining Club** | To enable long-serving members to be identified and recognised. |
| **Ethnicity** | Requested by BE for statistical analysis and equal opportunity monitoring |
| **Disability** | To allow club to fulfil its safeguarding duties and make necessary adjustments |
| **Emergency Contact Details** | In case of accident or sudden illness of a member |
| **Parent Contact Details** | Required for any junior member under 18 |

***When is the Data Collected and Reviewed?***

1. 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?***

1. The data is collected by the Club Secretary and/or Membership Secretary. To ensure the security of the data held, the Club requires that access to their computers is password protected and that any file holding the information is also individually password protected.

***Sharing Personal Date outside the Club***

1. Data is shared with the Norfolk Bowling Association and with the national governing body, Bowls England, so that they too can properly manage and administer your affiliated membership with them. The data is shared via a national Membership Register, the content of which is controlled at all levels by limited and authorised access.
2. Neither the Club, nor the NBA, nor Bowls England permits the sharing of personal data held on the Membership Register to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.
3. Where direct consent is given by a member having an identified responsibility or role within their organisation, specific and limited information may be published by the Club, NBA or BE in annual handbooks or on their websites and other social media for the purposes of effective appropriate communication within the sport. The holders of posts within one or more of these organisations will be required to formally consent to the use of specified personal information in this way, and such consent will be recorded by the relevant organisation.

***Member’s Rights to their Personal Data***

1. Each individual member has the right and the facility to directly access and manage their personal data held on the Membership Register. No one else other than the Club Data Processor has the facility to add or modify personal data. There will be no charge for such access to data. The data held on a member will be deleted within one month of notice that the member has left or is not re-joining the Club.

***Young People’s Data***

1. 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. **Only the name of a young person will be given in the club handbook.** Any member requiring contact with a young person should approach the Club Secretary to seek agreement for the release of contact details.

***Breaches of Data Security***

1. 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 President, 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 Management Committee.
2. 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).
3. 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. Specifically, membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

***Consent on the Holding and Use of the Data***

1. On applying to join the Club, a member will be given a copy of this policy and asked to confirm that they have read and accept it and that the Club may use the personal data in the proper pursuance of managing their relationship with the member.
2. In addition, members will be asked to consent to the publication of their name and contact details in the Club Contact Details sheet for communications and so that they and other members can arrange matches as part of Club Competitions*.*
3. The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

***Reviews***

It is expected that a member will update their personal information if it changes during the year. At the annual subscription renewal, members will be asked to confirm the accuracy of the data held on them. At least every four years, members will be asked to reconfirm their consents as described above.