



Monkstone Pétanque Club

Data Protection Policy

Version 1.1 May 2018

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Introduction

This policy applies to all members. You must be familiar with this policy and comply with its terms.

This policy sets out how we seek to protect personal data and ensure that the Executive understand the rules governing their use of personal data to which they have access as a result of their position. In particular, this policy requires members of the Executive to ensure that the Data Protection Officer (DPO) be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

Definitions

The Club	Monkstone Pétanque Club
Membership purposes	<p>The purposes for which personal data may be used by us: Personnel, administrative, financial, regulatory, and Club development purposes.</p> <p><i>Membership purposes include the following:</i></p> <ul style="list-style-type: none">- <i>Compliance with our legal, regulatory and Club governance obligations and good practice</i>- <i>Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests</i>- <i>Ensuring Club policies are adhered to (such as policies covering email and internet use)</i>- <i>Investigating complaints</i>- <i>Monitoring members' conduct, disciplinary matters</i>- <i>Marketing the Club</i>- <i>Improving services</i>
Personal data	<p>Information relating to identifiable individuals.</p> <p><i>Personal data we gather may include: individuals' contact details, age, gender etc.</i></p>
Sensitive personal data	<p><i>Personal data about an individual's age, gender etc — any use of sensitive personal data should be strictly controlled in accordance with this policy.</i></p>



Scope

This policy applies to all members. You must be familiar with this policy and comply with its terms.

We may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be circulated to members before being adopted.

Who is responsible for this policy?

Our Data Protection Officer (DPO), for the time being, has overall responsibility for the day-to-day implementation of this policy.

Our procedures

Fair and lawful processing

We must process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.

The DPO's responsibilities:

- Keeping the Executive updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Arranging data protection training and advice for all staff members and those included in this policy
- Answering questions on data protection from members and other stakeholders
- Responding to members who wish to know which data is being held on them by the Club



- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing
- Ensure all systems, services, software and equipment meet acceptable security standards
- Checking and scanning security hardware and software regularly to ensure it is functioning properly
- Researching third-party services, such as cloud services the Club may be considering using to store or process data
- Approving any data protection statements attached to emails and other marketing copy
- Addressing data protection queries from clients, target audiences or media outlets
- Ensuring all marketing initiatives adhere to data protection laws and the Club's Data Protection Policy

The processing of all data must be:

- Necessary to for the running of the Club
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine data processing activities.

Our Membership Application/Renewal Form contains a Privacy Notice to members on data protection.

The notice:

- Sets out the purposes for which we hold personal data on members
- Provides that members have a right of access to the personal data that we hold about them



Sensitive personal data

In most cases where we process sensitive personal data we will require the data subject's *explicit* consent to do this unless exceptional circumstances apply or we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety). Any such consent will need to clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.

Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the DPO.

Your personal data

You must take reasonable steps to ensure that personal data we hold about you is accurate and updated as required. For example, if your personal circumstances change, please inform the DPO so that they can update your records.

Data security

You must keep personal data secure against loss or misuse.

Storing data securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it
- Printed data should be shredded when it is no longer needed
- Data stored on a computer should be protected by strong passwords that are changed regularly.



- Data stored on CDs or memory sticks must be locked away securely when they are not being used
- The DPO must approve any cloud used to store data
- Data should be regularly backed up in line with the Club's backup procedures
- Data should never be saved directly to mobile devices such as laptops, tablets or smartphones

Data retention

We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention guidelines.

Transferring data internationally

There are restrictions on international transfers of personal data. You must not transfer personal data anywhere outside the UK without first consulting the DPO.

Subject access requests

Please note that under the Data Protection Act 1998, individuals are entitled, subject to certain exceptions, to request access to information held about them.

If you receive a subject access request, you should refer that request immediately to the DPO. We may ask you to help us comply with those requests.

Please contact the DPO if you would like to correct or request information that we hold about you. There are also restrictions on the information to which you are entitled under applicable law.

Processing data in accordance with the individual's rights

You should abide by any request from an individual not to use their personal data for direct marketing purposes and notify the DPO about any such request.



Do not send direct marketing material to someone electronically (e.g. via email) unless they have specifically agreed to receive such material.

GDPR provisions

Where not specified previously in this policy, the following provisions will be in effect on or before 25 May 2018.

Privacy Notice - transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for the Club. The following are details on how we collect data and what we will do with it:

What information is being collected?	Contact details, age, gender
Who is collecting it?	The Club Executive
How is it collected?	Membership Application/Renewal Form
Why is it being collected?	To facilitate the efficient running of the Club
How will it be used?	To contact members, to verify age to ascertain fees due and eligibility for age restricted competitions
Who will it be shared with?	Members of the Executive
Details of transfers to third country and safeguards	Not applicable
Retention period	2 years after membership ceases

Conditions for processing

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. Anyone responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice.



Justification for personal data

We will process personal data in compliance with all six data protection principles.

We will document the additional justification for the processing of sensitive data and will ensure any biometric and genetic data is considered sensitive.

Consent

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

Criminal record checks

Any criminal record checks are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

Data portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request will result in the forfeiture of membership of the Club.

Privacy by design and default

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start.

When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.



International data transfers

No data may be transferred outside of the EEA without first discussing it with the DPO. Specific consent from the data subject must be obtained prior to transferring their data outside the EEA.

Data audit and register

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

Reporting breaches

All members have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures

Monitoring

Everyone must observe this policy. The DPO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

Consequences of failing to comply

We take compliance with this policy very seriously. Failure to comply puts both you and the Club at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in expulsion.

If you have any questions or concerns about anything in this policy, do not hesitate to contact the DPO

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