

### Introduction

The Club Secretary is the Data Controller for the purposes of the Data Protection Act 2018 (hereafter referred to as DPA) on behalf of Shepton Mallet Bowls and Tennis Club (hereafter referred to as “The Club”)

The Club uses personal data about living individuals for the purposes of general administration and communication.

The Club recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the DPA.

The Club adheres to the eight principles of the DPA.

### Principles

The principles of the DPA require that personal data shall:

- Be processed fairly and lawfully.
- Be obtained for a specified and lawful purpose.
- Be adequate, relevant and not excessive for those purposes
- Be accurate and, where necessary, kept up to date
- Not be kept for longer than is necessary for that purpose
- Be processed in accordance with the data subject’s rights
- Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage.
- Not to be transferred to a country or territory outside the European Economic Area.

## **Confidentiality**

The Club will treat all personal information as private and confidential and not disclose any data to anyone other than to members of the management committee in order to facilitate the day-to-day administration of the Club. This principle applies to all individuals, irrespective of membership of the Club.

Information and data stored by the Club will not be distributed in any form such as digital, hard copy or any other form which might breach the DPA.

Personal data will not be given or sold to any other person, company or organisation.

All officers of the Club and Club members who have access to personal data must abide by this policy.

### **There are four exceptional circumstances to the above permitted by law:**

- Where we are legally compelled to do so
- Where there is a duty to the public to disclose
- Where disclosure is required to protect our interest
- Where disclosure is made at an individual's request or consent.

## **Use of Confidential Information**

The Club uses personal data for three main purposes:

- The day-to-day administration of the Club.
- Contacting individuals to inform them of Club news, activities and events.
- To produce a specific telephone list to enable Club members to contact each other to arrange matches or events.

Data will be held whilst individuals are involved with the Club and deleted 18 months after ceasing to be involved or the Club receives a written request to act otherwise. The Club will retain historical membership lists that give name, street, town and type of membership. This information will not be released to the public domain before 30 years. The Club may retain statutory records for a longer period.

## **Membership Database**

Membership Information is held on the Club Membership Database stored on an appropriate cloud based file storage service with password protection and accessible only to limited individuals within the Club membership as determined by the Data Controller.

## **Electronic Storage of Data**

Any member who stores personal information obtained under this policy on any electronic system not connected to the Club file storage service (eg Bowls' Captains) are required to do so in accordance with the principles of the DPA and to take due care to ensure that the information remains secure through the use of passwords.

Where such persons cease to be a member of the Club they are required immediately to delete any electronically held data and return all Club information whether about members or otherwise to the Data Controller.

## **Right of Access**

Any individual whether connected with the Club or otherwise has the right to access any personal data that is being kept about them either electronically or in paper-based filing systems, be informed how that information was obtained and for what purpose, to require any incorrect data to be amended and kept up to date and to be informed how the Club ensures it complies with its obligations under the DPA.

Any person who wishes to exercise this right should make the request in writing to the Club Secretary.

The Club will comply with requests for access to personal information within 10 days.

## **Photographs**

Photographs taken within the Club perimeters at Club events may include individuals or groups of individuals attending these events. These photographs will be used solely for the purpose of the Club advertising, marketing and public relations, and may thus appear in any advertising internal and or external, website or other publicity material.

The DPA applies where photographs are taken for official use, such as for identity passes, and these images are stored with personal details. Permission will be sought at the time to ensure compliance with the Act.

Photographs taken at Club events purely for personal use are exempt from the DPA.

## ***Emails***

Where multiple emails are sent to those involved in Club activities they will be sent bcc (blind courtesy copy) and permission will be sought from any individual to continue to receive such information.

## ***Implementation and Review***

Before new activities are introduced concerning the collection and processing of data beyond that currently envisaged, the proposals will be reviewed by the management committee and benchmarked against the principles of this policy to ensure compliance.

Robert Goodhand

Club Secretary

28May21