

Data Protection Policy for Shepton Mallet Sports and Community Group

Issue 3.2

Introduction

The Secretary is the Data Controller for the purposes of the Data Protection Act 2018 (hereafter referred to as DPA) on behalf of Shepton Mallet Sports and Community Group. (hereafter referred to as “SMSCG”)

SMSCG uses personal data about current and former members whether living or deceased as a matter of historical record and for the purposes of general administration and communication.

SMSCG 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 SMSCG 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 while recognising the principles of paragraph 2 of the Introduction.
- 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

SMSCG will treat all personal information, excepting the name of the individual, as confidential and not disclose any data to anyone other than to officers of SMSCG or Committee members of the constituent activities. That data will generally consist of

address, telephone (including mobile) and email in order to facilitate the day-to-day administration plus a record of achievements and involvement in that activity.

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

For the purposes of clarity, membership of activities within SMSCG is not confidential information.

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 the SMSCG's interest
- Where disclosure is made at an individual's request or consent.

Use of Confidential Information

SMSCG uses personal data for two main purposes:

- The day-to-day administration of activities within SMSCG.
- Contacting individuals to inform them of SMSCG news, activities and events.

The SMSCG will retain historical membership lists indefinitely including name, address name and type of membership. Further SMSCG will retain details of cups, awards and significant contributions to activities within the Group indefinitely,

Membership Database

Membership Information is held on the SMSCG Membership Database stored on an appropriate secure cloud based file storage service accessible only to limited individuals within the SMSCG membership as determined by the Data Controller in accordance with this policy.

Electronic Storage of Data

Any member who stores personal information obtained under this policy on any electronic system not connected to the SMSCG 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.

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

Right of Access

Any individual whether connected with the SMSCG 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 SMSCG 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 SMSCG Secretary.

Photographs

Photographs taken within the SMSCG perimeters at SMSCG events may include individuals or groups of individuals attending these events. These photographs will be used solely for the purpose of the SMSCG 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 SMSCG events purely for personal use are exempt from the DPA.

Emails

Where multiple emails are sent to those involved in SMSCG activities they will be sent bcc (blind courtesy copy). Individuals may request their name be removed from such lists.

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 officers and benchmarked against the principles of this policy to ensure compliance.

Robert Goodhand
SMSCG Secretary
Updated 01 Jan 24