



Three Mile Cross Bowling Club
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Club Privacy Policy under the General Data Protection Regulations (GDPR)

1. Introduction

This policy concerns the personal information (data) held by the club, its security and use. The policy is written in response to the GDPR, in force from 25th May 2018. It defines the people involved, the data collected by the club, how it is stored and used internally and externally plus members' rights over the data.

2. Management of the Policy and Control of Data

The Data Controller for the purposes of the GDPR will be the club through the Management Committee. It will be responsible for the implementation and maintenance of this policy. For reporting purposes, the Privacy Policy will be managed by the Secretary. The Secretary shall be responsible for advising the Management Committee on data protection issues. The subject shall be made a standing item on the Management Committee's meeting agendas.

The main holder of personal data (known in the Regulations as the Data Processor) is the Membership Secretary. The Membership Secretary holds the club membership database on their personal computer. To ensure the security of the data held, the club requires that access to their computer is password protected and that any file holding the information is also individually password protected. The Membership Secretary is responsible for the collection of the data and its security. He/she will ensure that permission of the data to be held, used, and shared as described below is given, and update or delete club records where required.

3. Personal Data

To effectively run and manage the club it is necessary to maintain a certain number of records. The club maintains a record of members' home addresses, email addresses, telephone numbers, plus further contacts in case of emergency. Members' ages and genders are required in view of the various leagues and competitions. Winners (name only) of club competitions are permanently displayed on the club's honours board in the clubhouse. The table below summarises the type of data collected and the reasons for collection.

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	Club information can be sent to members who do not have an e-mail address. It also facilitates shared transport arrangements.
Telephone Number	Home and mobile numbers are requested for contact purposes.
Email Address	Email is the prime means of communication with members over teams, events, general matters.
Age	Age is required to ensure that members pay the correct membership fee and are qualified to enter certain competitions.
Gender	Some leagues and competitions are gender specific.
Date of Joining Club	To enable long-serving members to be identified and recognised.
Emergency Contact Details	Required in case of accident or sudden illness of a member.
Parent/Guardian Contact Details	Required for any junior member under 18.

Data is collected when a new member first joins the club via a Club Membership Application form. The form asks for a limited amount of information. Completed forms are retained by the Membership Secretary and not shared with anyone, inside or outside of the club. It is expected that members will inform the Membership Secretary if their personal information changes during the year. The accuracy of the personal information will be reviewed annually when members renew their membership via the Club Membership Renewal form.

Details of playing members are forwarded to Bowls England and the Royal County of Berkshire Bowling Association for the purpose of collection of affiliation fees, plus where members have entered County competitions. Only essential data is provided.

A Membership Directory containing names, telephone numbers and email addresses is held within BIAS (Bowling-club Integrated Administration System). To view contact details, members can log in to BIAS online using their own password. Details are only available to members whilst they retain their membership. Individual members can directly access and manage their personal data held on the system. Only the club BIAS Administrator and the Membership Secretary have the facility to add or modify personal data.

The club will also maintain a Club Contact Details list, containing names, telephone numbers and email addresses, together with emergency contact details, for all members (playing and social). A printed copy of this list will be kept in a folder at the clubhouse for urgent need but will not be on public display. The Membership Secretary will maintain and revise this list on being informed by members of any necessary changes.

If any club member is aged 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 the young person will be included on the Club Contact Details list.

4. Safeguarding

The club has a Safeguarding Officer who is registered with Bowls England. To fulfil his/her duties the Officer may ask to record a specific disability of any member to allow the club to fulfil its safeguarding duties.

5. Sharing Personal Information

Apart from that mentioned under section 3, the club will not disclose any personal information to third parties without a member's permission. This might include requests for marketing information or photographs taken within the club.

The club can disclose personal information to authorised parties if it is required to do so by law.

The club has committed to the use of a management and administration package with Bowling-club Integrated Administration System (BIAS). BIAS stores and processes personal data as an agent (data processor) of the club in accordance with this policy. It does not use the data for any other purpose. Information is kept securely and backups are kept for one year for the sole purpose of IT system disaster recovery.

6. Photographs and CCTV

For the purposes of promoting the club and events we may use photographs of club members in marketing publications, social media and on the club website. This will only be done with the permission of the member or, in the case of juniors, their parent or guardian.

The club uses CCTV cameras to safeguard its premises and car park and may use this video to investigate incidents on its premises. No footage will be shared with a third party unless, for example, at the request of emergency services. The CCTV filming is on a rolling programme which is routinely deleted after a period of fifteen days.

7. Club - Wide Email Messages

The main method of communicating fixtures, events, organisational matters, and important news to members is via email. A limited number of people have access to the club's email distribution list. In order to prevent misuse any club wide email messages should be sent by blind copy so that individuals' email addresses are not displayed.

8. Website

The club's website contains general information for the public and has a password-controlled members' section for specific club issues. No information on individuals will appear without the member's permission.

The website has a Contacts page which contains details of club officers who regularly need to be contacted by other clubs, potential new members etc. The details shown will only contain information that has been agreed with that officer prior to its being posted.

The club's website may contain links to other websites of interest. Once these links have been used to leave the club's website and access another website, the club cannot be responsible for the protection and privacy of any information that may be provided. Such sites are not governed by this privacy notice.

9. Members' Rights

In addition to the rights contained in the relevant legislation, every member of the club has the facility to request a copy of what personal information is held on them, and by whom. There is also the opportunity to correct, delete or restrict processing of personal data if felt inappropriate. This will be dealt with by the club's Data Processors on behalf of the Management Committee. Any formal request shall be actioned by the club within one calendar month of receipt in writing.

Anyone leaving or not re-joining the club shall have their details deleted from the club's records (other than where 'Honours' are displayed) within one calendar month of being formally advised by the individual concerned.

10. Breach of Security

The club shall take all reasonable steps to safeguard the security and confidentiality of personal data provided to the club.

Any perceived breaches of data security must be reported in writing to the Data Processors. This will be reported to the Management Committee within seven days in order to decide the appropriate course of action by the club.

If the breach is considered to be injurious to the rights and freedom of the complainant, then the Secretary must report it immediately to the Information Commissioners Office.

11. Policy Review

The Management Committee (via an appointed Sub Committee) shall review this policy annually, or sooner if there is a change in legislation or an operational issue that necessitates immediate attention.