



Plymouth Life Centre Indoor Bowls Club Club Privacy Policy under the General Data Protection Regulations (GDPR)

Introduction

This policy concerns the personal information (**data**) held by the Plymouth Life Centre Indoor Bowls Club (The Club), its security and use. The policy is written in response to **GDPR**, which came into force on 25 May 2018.

This policy 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

The Club uses this data solely for the purposes of the effective running of the Club. It also shares data with the DCIBA (Devon County Indoor Association), DCLIBA (Devon County Ladies Indoor Bowls Association) and EIBA (English Indoor Bowls Association) for their purposes in administering our sport.

Control of Data

- The **Data Controller** for the purposes of the GDPR will be the **Club** through the **Executive 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.
- The **Data Processor** will be the **Club Membership Secretary** will administer the club's-membership database.

The Club Membership Secretary will be responsible for the:

- collection of the data;
- for its security;
- for ensuring that permission for the data to be held, used, and shared as described below is given; and
- for updating of club records including deletion where required.

In the absence of the Membership Secretary, this responsibility will be **The Communication Secretary**.

What Data is Collected and why?

- The Club collects contact and membership details to enable us properly to manage and administer your membership with us, the EIBA, DCIBA & DCLIBA.
- These details are set out in the membership form(s).
- This information is lawfully required and collected as a standard part of your application to join or re-join our Club.

The Club does not collect or hold any other 'sensitive data' such as health issues.



1. The table below summarises the types 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	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 for inclusion in the contact details held privately on our website.
E-mail address	Prime means of communication with members over teams, events, general matters.
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.
Contact Details	Required for contact purposes in the event of ill health.

When is the Data Collected and Reviewed?

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?

The data is collected by the Club Membership Secretary (the club's Data Processor).

Sharing Personal Data inside and outside the Club

Data is shared with the EIBA, DCIBA & DCLIBA, so that they too can properly manage and administer your affiliated membership with them.

Data is shared with the Communications Secretary solely for the purpose of sending Club specific information on behalf of The Management Committee.

The Club will not permit the sharing of personal data to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.

Member's Rights to their Personal Data

Each individual member has the right to view their personal data held on the Club's membership database, which they may request from the club's Data Processors. The Data Processors must supply the required data within one month and they must immediately amend or delete data, when requested to do so by an individual member. No one other than a 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

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 Bowls England 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.

Breaches of Data Security

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 Chairman, 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 Executive Committee.

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).

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. The Club will not keep personal data for any longer than they are needed.

Files (electronic or paper) containing Safeguarding or discipline matters will only be held for as long as they are relevant. They will be sealed immediately after the conclusion of the matter and destroyed as follows:

- 1 year following final conclusion of a disciplinary matter and
- 3 years from reporting for Safeguarding issues

Specifically, membership lists containing personal data will not be displayed on notice boards or the website for public viewing.

Consent to the Holding and Use of the Data

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.

In addition, members will be asked to consent to the publication of their name and contact details on the Club Contact Sheet and the Club's membership list for communications about club matches, administration and events and so that they and other members can arrange matches as part of Club Competitions.

The Club will seek to always use a **bcc (blind copies)** system when any e-mails are sent to multiple members.

Reviews

It is expected that the Club data processors will update individuals' 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.