



# Upper Donside Bowling Club

## GENERAL DATA PROTECTION REGULATIONS (GDPR) POLICY

April 2025 (review date: April 2026)

### *Introduction*

1. This policy concerns the personal information (**data**) held by the Club, its security and use.
2. The policy is written in response to the **GDPR**, in force from 25 May 2018. It 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*

3. The Club uses this data solely for the purposes of the effective running of the Club. It does not share the data with external bodies or organisations without the permission of the individual(s).

### *Control of Data*

4. The **Data Controller** for the purposes of the GDPR will be the **Club** through the Club 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 President**, who will fulfil this role.
5. The **Data Processors** will be the **Club Secretary and Treasurer**, who will hold separate club membership databases on their computers. Together they will be responsible for the collection of the data, its security, ensuring that permission for the data to be held, used, and shared as described below is given, and updating of club records including deletion where required.

### *What Data is Collected and Why*

6. We collect all contact and membership details to enable us properly to manage and administer your membership with the Club. These details include your contact details, and details of a contact in case of emergency. This information is lawfully required and collected as a standard part of your application to join or re-join our Club.



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7. The table below summarises the types of data collected and the reasons for collection.

| Data Collected                   | Reason for Collection   |
|----------------------------------|---|
| <b>Name</b>                      | 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.      |
| <b>Address</b>                   | Required so that club information can be sent to members, who do not have an e-mail address. It also facilitates shared transport arrangements. |
| <b>Phone Number</b>              | Telephone numbers are requested for contact purposes  |
| <b>E-mail address</b>            | Prime means of communication with members over teams, events and general matters.   |
| <b>Emergency Contact Details</b> | In case of accident or sudden illness of a member.  |

## ***When is the Data Collected and Reviewed?***

8. This data is captured when a member first joins the Club. The accuracy of the personal information will be reviewed annually when a member renews their membership.

## ***Who Collects and Holds the Data?***

9. The data is collected by the Club Secretary and/or Treasurer. To ensure the security of the data held, the Club requires that access to their computers is *password protected* and/or *fingerprint protected* and that any file holding the information is also individually *password protected*.

## ***Sharing Personal Data outside the Club***

10. Data is not routinely shared with any external bodies or organisations. Should that need arise permission will be sought from the individual(s) affected.
11. The Club does not permit the sharing of personal data held by the Club to any third party whatsoever. Specifically, personal data will not be released to any other organisation for marketing or communication purposes.



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12. Where direct consent is given by a member having an identified responsibility or role within their organisation, specific and limited information may be published by the Club on the website and other social media for the purposes of effective appropriate communication within the sport. The holders of posts within one or more of these organisations will be required to formally consent to the use of specified personal information in this way, and such consent will be recorded by the relevant organisation.

## ***Member's Rights to their Personal Data***

13. Each individual member has the right and the facility to directly access and manage their personal data held by the Club. No one else other than the Club Data Processors have 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***

14. GDPR will set an age for a young person to give their own consent to the collection and storage of their personal data. 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. Any member requiring contact with a young person should approach the Club Secretary to seek agreement for the release of contact details.

## ***Breaches of Data Security***

15. 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 President, 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 Committee.
16. 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 President has 72 hours to report the incident to the Information Commissioners Office (ICO).



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

## ***Consent on the Holding and Use of the Data***

18. 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.
19. When necessary, members will be asked to consent to the publication of their name and contact details in the Club Contact Details sheet for communications and so that they and other members can arrange matches as part of Club Competitions.
20. The Club will seek to always use a bcc system when any e-mails are sent to multiple members.

## ***Reviews***

It is expected that a member will update their 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. At least every four years, members will be asked to reconfirm their consents as described above.